

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: United Plantations Berhad
Client Company / Parent Company Address: Jendarata Estate 36009 Teluk Intan, Perak, Malaysia
Certification Unit: United International Enterprises POM
Location of Certification Unit: KM 9, Jalan Bruas-Ayer Tawar, Pantai Remis, 34900 Perak, Malaysia
Date of Final Report: 29/07/2024

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Section 1: Scope of the Assessment

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

2. Certification Information			
Certificate Number	RSPO 693198	Certificate Start Date	29/09/2022
Date of First Certification	29/09/2012	Certificate Expiry Date	28/09/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 Mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 693206	MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd.	27/09/2028
MSPO 693205	MSPO MS 2530-4 – General Principles for Palm Oil Mills		27/09/2028
MSPO 709995	MSPO Supply Chain Certification Standard 2018		11/07/2024

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

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	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	8,949.56	12.53	1,403.11	10,365.20	86.34

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
UIE Estate	0	5,166.41	3,783.15	0	8,949.56	0
Total (ha)	0	5,166.41	3,783.15	0	8,949.56	0

Note: Only Mature area is considered as production area
*57.73% of OP is under prime age which contribute to the most optimum yield

7. Summary of Certified Tonnage of FFB (Own Certified Scope)	
	Tonnage (MT) / year

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Estate / Smallholders	Estimated last year (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (July 23 – Aug 23)	Current license period (Sept 23 – June 24)	
UIE Estate	298,000.00	64,084.16	245,238.70	310,000.00
Total	298,000.00	309,322.86		310,000.00

Note: Approximately 57.73% of OP is under prime age which contribute to the most optimum yield as well as the actual FFB production during July 2023-June 2024 could demonstrate that they achieved to have FFB production at 34 tons/ha/year. Therefore, the forecast FFB production for the next year license is follow the actual FFB production verified in the last 12 months.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (July 23 – Aug 23)	Current license period (Sept 23 – June 24)	
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (July 23 – Aug 23)	Current license period (Sept 23 – June 24)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	July 2023	32,484.33	0	32,484.33
2	Aug 2023	31,599.83	0	31,599.83
3	Sept 2023	30,095.86	0	30,095.86
4	Oct 2023	27,024.29	0	27,024.29

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5	Nov 2023	24,398.10	0	24,398.10
6	Dec 2023	23,771.68	0	23,771.68
7	Jan 2024	21,163.69	0	21,163.69
8	Feb 2024	17,936.02	0	17,936.02
9	Mar 2024	24,595.16	0	24,595.16
10	Apr 2024	25,515.90	0	25,515.90
11	May 2024	25,862.81	0	25,862.81
12	June 2024	24,875.19	0	24,875.19
TOTAL		309,322.86	0	309,322.86

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
	Previous license period (July 23 – Aug 23)	Current license period (Sept 23 – June 24)	
FFB	FFB		FFB
298,000.00 mt	64,084.16 mt	245,238.70 mt	310,000.00 mt
	TOTAL	309,322.86 mt	
CPO (OER: 23 %)	CPO (OER: 21.6 %)		CPO (OER: 23 %)
68,540.00 mt	13,938.44 mt	53,053.49 mt	71,300.00 mt
	TOTAL	66,991.93 mt	
PK (KER: 4.8 %)	PK (KER: 4.07 %)		PK (KER: 4.8 %)
14,304.00 mt	2,885.46 mt	9,714.96 mt	14,880.00 mt
	TOTAL	12,600.42 mt	

*Extension of volume: FFB – 25,000 mt, CPO: 5,250 mt, PK: 1,125 mt.

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2023	7,020.410	1,405.320
2	Aug 2023	6,918.030	1,480.140
3	Sept 2023	6,405.520	1,396.720
4	Oct 2023	5,865.920	1,149.450
5	Nov 2023	5,290.970	988.060
6	Dec 2023	4,886.190	919.350
7	Jan 2024	4,404.950	859.900

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8	Feb 2024	3,846.050	657.100
9	Mar 2024	5,264.730	999.620
10	Apr 2024	5,543.280	992.670
11	May 2024	5,609.640	959.360
12	June 2024	5,936.240	792.730
TOTAL		66,991.93	12,600.42

11. Summary of Actual Volume sold					
Current License period (Sept 2023 – June 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	50,142.19	0	0	0	50,142.19
PK (MT)	8,154.81	0	0	0	8,154.81
Credits	0	0	0	0	0
Previous License period (July – Aug 2023)					
CPO (MT)	12,753.36	0	0	0	12,753.36
PK (MT)	2,715.36	0	0	0	2,715.36
Credits	0	0	0	0	0
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	XXX	XXX	62,895.55	10,870.17
TOTAL			62,895.55	10,870.17

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)

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1	N/A	N/A	N/A
TOTAL		N/A	N/A

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

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

Note: 1 mt = 1 credit

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

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **02/07/2024 – 05/07/2024**. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

Meetings were held with stakeholders to seek their views on the performance of the certification unit with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
UIE POM	✓	✓	✓	✓	✓
UIE Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: July 1, 2025 - July 4, 2025

Total Number of Mandays: 9.5 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Zainal (MHZ) Hidhir Abidin	Team Leader	<p>Education: Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohamad Saifullah	Team Member	<p>Education: Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia.</p>

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<p>Mohamad Senan (MAS)</p>		<p>Work Experience: With over 6 years of experience in oil palm plantation operations, agriculture, safety, and health-related fields, he has been an integral part of a large publicly listed plantation organization since 2012. His job responsibilities include supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice, and other standard operating procedures. He has also actively participated in internal audits of plantation operations to ensure adherence to RSPO, ISCC, and MSPO requirements.</p> <p>Subsequently, he spent 6 years working with an international Certification Body (CB), conducting certification audits of plantation operations for compliance with RSPO, MSPO, and ISCC requirements. He is a qualified Lead Auditor for RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and MSPO Supply Chain certification audits, as well as a qualified Auditor for ISO 9001:2015 certification audits. Since January 2019, he has conducted audits in various countries, including Malaysia, Indonesia, Cambodia, Thailand, Singapore, Japan, India, Germany, and Spain. His expertise extends to the Palm Oil sector, encompassing industry fundamentals such as good agricultural practices (GAP), best management practices (BMP), sustainability, social issues (e.g., worker welfare and employment terms, gender issues), occupational health and safety (OHS) matters, and environmental considerations (e.g., pollution control and resource conservation).</p> <p>Training attended: Attended, completed and passed ISO 9001:2015 Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor Course (CQI-IRCA certified), RSPO P&C Lead Auditor Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Training Course (endorsed by RSPO Secretariat), RSPO P&C 2018 Version Introduction Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Update Course (endorsed by RSPO Secretariat), MSPO Lead Auditor Course (endorsed by MPOCC), MSPO Supply Chain Certification Training Course (endorsed by MPOCC), ISCC EU and PLUS Basic Training, ISCC Greenhouse Gas Training, ISCC Waste and Residues Training, SA8000 Introduction & Basic Auditor Course, and HCV-HCSA Assessor Training Course.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English languages.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Zulkifli Kamarol Zaman (ZKZ)</p>	<p>Team Member</p>	<p>Education: He graduated in Bachelor of Science (Agribusiness) from University Putra Malaysia (UPM) in 2008.</p> <p>Work Experience: He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&C, RSPO SCCS and PEFC CoC standard.</p>

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		<p>Training attended: He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, ISO 9001:2015 Lead Auditor Course in October 2023, ISO 45001:2018 Lead Auditor Course in November 2023 and SA8000 Introduction & Basic Auditor Training Course in November 2023.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
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Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	MHZA	MAS	ZKZ
Monday 01/07/2024	PM	Audit team travel to Manjung. Check in at Double Happiness Hotel, Seri Manjung	√	√	√
Tuesday 02/07/2024 UIE POM	0730	Audit team travel to UIE POM	√	√	√
	0830	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings 			
	0900 1300	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√
	1300 1400	Lunch break	√	√	√
	1400 1630	Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√

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	1630 1700	Interim Closing Briefing	√	√	√
Wednesday 03/07/2024	0730	Audit team travel to UIE POM	√	√	√
UIE POM/estate	0830 1300	Continue with unfinished elements from day 1	√	√	√
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	1300 1400	Lunch break	√	√	√
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 1700	Interim Closing Briefing	√	√	√
Thursday 04/07/2024	0730	Audit team travel to UIE Estate	√	√	√
UIE Estate	0830 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1300 1400	Lunch break	√	√	√
	1400 1630	Continue with pre-lunch activities & document review.	√	√	√
	1630 1700	Interim Closing Briefing	√	√	√
Friday 05/07/2024	0730	Audit team travel to UIE POM	√	-	-
	0830 1230	RSPO Supply chain requirements for mill <ul style="list-style-type: none"> - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Rules on Market Communication and Claims 	√	-	-
	1230 1330	Closing meeting – conclusion and recommendation	√	-	-

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT. Surya Sawit Sejati is a subsidiary company of United Plantations Berhad. PT Surya Sawit Sejati have operate 1 palm oil mill that supplied by 2 Inti estates (Lada and Runtu Estates) and Plasma smallholders estate (Plasma Kumai and Arut).	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	The RSPO Initial Assessment has been carried out on 11-15 th December 2017 on initial HGU areas and have successfully obtained RSPO certificate in November 2018 and Scope Extension Audit conducted in November 2019 for 6717.62ha. The balance area will be certified in tandem with the issuance of land titles (HGU, HGB, Hak Pakai, Hak Milik) by the Government of Indonesia.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	The new time bound of 2025 was approved by RSPO Secretariat on 26 May 2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, the new time bound is 2025.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	There is no comments from stakeholders. The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024).	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since	Complied

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	<p>there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has submitted RaCP proposal and successfully obtained the approval on 4th October 2019.</p> <p>In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder. The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development.</p>	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has submitted RaCP proposal and successfully obtained the approval on 4th October 2019.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form.</p>	<p>Complied</p>

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Procedure for calculating and distributing fair compensation has been in place in the similar document of SOP land compensation No. HRD-015-R00 dated 1 January 2016. It explains that the company has a standard of compensation calculation but also giving the compensated person a bargaining/negotiation position. The record of compensation process and outcome of negotiated agreement is documented. Based on interview with the community the community has understand the procedure of land compensation and their involvement in the compensation process. The result of the compensation process is distributed to the compensated party and can be accessed by stakeholder through information request.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Personnel in charge to manage the legal documentation system are Legal Department (Led by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up trough procedure No: SOP-HRD-017-R00.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	PT. Surya Sawit Sejati has conducted annual RSPO internal audits.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes, we conduct stakeholders meeting annually.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are	Not applicable.	Not Applicable

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not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.		
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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
				Latitude	Longitude						Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Lada Estate (balance HGU)	Indonesia	Lada Estate	Desa Sungai Rangit Jaya, Kecamatan Pangkalan Lada, Kabupaten Kotawaringin Barat, Kalimantan Tengah	2.493056° S	111.723056° E	1796.61 (HPK) + 215 (APL) + 46 (APL) + 12.26 (HGB) + 27.73 (Hak Pakai)	Not Certified	2023	Not certified	RSPO ASA in 2022	Yes	2025	HPK - Process Pelepasan is ongoing at the Environment and Forestry Department Jakarta. Awaiting the Integrated Team to conduct on the ground survey and upon completion of Pelepasan Process, the SK Pelepasan from the Minister of Environment and Forestry Department Jakarta will be issued. APL - Panitia B process and on the ground survey by Integrated Team. Currently we are proceeding to HGU application at Land Office. HGB for building - Has been obtained. As there is	25-May-23

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													no oil palm planting on HGB area, we plan to conduct RSPO Scope Extension Assessment when HGU has obtained for the area under HPK & APL. Hak Pakai for conservation area - Awaiting payment of BPHTB (tax) to Bapenda and issuance of Hak Pakai. As there is no oil palm planting on this area, we will conduct RSPO Scope Extension Assessment along with the HPK and APL area as stated above.	
Runtu Estate (balance HGU)	Indonesia	Runtu Estate	Desa Runtu, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat, Kalimantan Tengah	2.375278° S	111.68944 4° E	4491.4 (APL) + 130 (APL) + 4.6 (HGB)	Not Certified	2023	Not certified	RSPO ASA in 2022	Yes	2025	APL - Awaiting Land Office to conduct Kadastral to produce HGU boundary map and thematic survey before the next step i.e forming Panitia B and producing outcome and decision of committee. Next, SK HGU will be issued and payment of BPHTB (tax) shall be made	25-May-23

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													before issuance of HGU. HGB for building - Has been obtained. As there is no oil palm planting on HGB area, we plan to conduct RSPO Scope Extension Assessment when HGU has obtained for the area under APL	
Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	Indonesia	Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	Plasma Lada: Desa Sungai Rangit Jaya, Kecamatan Pangkalan Lada, Kabupaten Kotawarin gin Barat, Kalimantan Tengah Plasma Runtu: Desa Runtu, Kecamatan Arut Selatan, Kabupaten Kotawarin	Plasma Lada: 2.493056° S Plasma Runtu: 2.375278° S Plasma Arut: 2.503611° S Plasma Kumai: 2.623333° S	Plasma Lada: 111.72305 6° E Plasma Runtu: 111.68944 4° E Plasma Arut: 111.65583 3° E Plasma Kumai: 111.84805 6° E	833 (Hak Milik) + 431.88 (Hak Milik in progress) + 1.48 (HGB) + 1115.82 (Hak Pakai)	Not Certified	2023	Not certified	RSPO ASA in 2022	Yes	2025	APL - Awaiting Land Office to conduct Kadastral to produce HGU boundary map and thematic survey before the next step i.e forming Panitia B and producing outcome and decision of committee. Next, SK HGU will be issued and payment of BPHTB (tax) shall be made before issuance of HGU. HGB for building - Has been obtained. As there is no oil palm planting on HGB area, we plan to conduct RSPO Scope Extension Assessment	25-May-23

			gin Barat, Kalimantan Tengah Plasma Arut: Desa Medang Sari, Kecamatan Arut Selatan, Kabupaten Kotawarin gin Barat, Kalimantan Tengah Plasma Kumai: Desa Sungai Bedaun, Kecamatan Kumai, Kabupaten Kotawarin gin Barat, Kalimantan Tengah										when HGU has obtained for the area under APL	
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3.3 Details of Nonconformities

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

During this Assessment there were zero (0) Critical; one (1) Minor nonconformities and two (2) Opportunity For Improvement raised. The United Plantations Berhad UIE POM and Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2517499-202407-N1	Issued Date	05/07/2024
Due Date	Next Assessment Visit	Closure Date	"open"
Indicator & Category (Critical / Minor)	7.3.1 – Minor		
Statement of Nonconformity:	Waste management and disposal plan was not effectively implemented		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is 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"> The contaminated soil to be included in the waste management plan. Drip trays to be placed under each parked tractor or the tractors which are under maintenance. Training to be provided for the workshop operators to ensure No. 2 is adhered and any contaminated soil must be disposed as scheduled waste. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 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. 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"> The mill management will obtain quotation from the contractor to extend the parking area. 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 Improvements	
OFI #	Description
OFI 1	<p>2517499-202407-I1</p> <p><u>Indicator 3.6.2</u></p> <p>As of now, the mill management has not yet received the report on the Chemical Exposure Monitoring, which was conducted from 12 to 13 June 2024. Consequently, an OFI has been raised to ensure follow-up on this matter during the next audit. The specific point to be verified is whether the recommendations from the report have been implemented by the POM management</p>
OFI 2	<p>2517499-202407-I2</p> <p><u>Indicator 6.7.1</u></p> <p>The process to ensure the frequency of OSH meeting conducted as per Occupational Safety and Health (Safety and Health Committee) Regulations 1996 could be further enhance.</p>

Positive Findings	
PF #	Description
PF 1	Good cooperation given by the management of UIE POM certification unit and HRESH team from HQ.
PF 2	Positive commentary given by both internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Minor Non-conformity			
NCR Ref #	2373358-202307-N1	Issued Date	27/07/2023
Due Date	Next Assessment (ASA2_2)	Closure Date	05/07/2024
Indicator & Category (Critical / Minor)	6.7.2 – Minor		
Statement of Nonconformity:	Monitoring of First Aid Box Items was not effectively implemented.		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
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. Other than that, 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:	1. The monitoring checklist for the items in first aid box has been further improved to include the expiry date for each item.		

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	<ol style="list-style-type: none"> 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 and estate management
Root Cause Analysis:	Lack of awareness by the Hospital Assistant who is in-charge of the replenishment and monthly monitoring of the items in the first aid box to ensure all items with expiry date are included and monitored in the checklist.
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 has been utilized and incorporated with expiry date for all items. 2. The monitoring checklist for first aid box will be included in the OSH internal audit checklist.
Assessment Conclusion:	<p>The following supporting evidence and activities have been thoroughly verified:</p> <ol style="list-style-type: none"> 1. The management has established a First Aid Kit Monitoring Checklist. This checklist mandates that each first aid kit should include 18 items, which are medicated oil, yellow lotion, Dettol, Eye Glo, W.O.W bandage 2", crepe bandage 5cm, eye pad, triangular bandage, handy plaster, micropore tape 1/2", sterile cotton pack, sterile gauze pack, gloves, blunt tip scissor, wooden split, safety pins, flanel, and antiseptic cream. 2. The most recent First Aid Training was conducted on 18/03/2024 by the Hospital Assistant (HA) for all Persons in Charge (PIC) of the First Aid Kit. 3. The most recent Sustainability Internal Audit was carried out on 21/02/2024 at UIE POM and 20/02/2024 at UIE Estates by the Human Resource, Sustainability & Safety (HRSS) Department. The internal audit reports underscore that the inspection of items in the first aid kit was incorporated as part of the audit. 4. The latest First Aid Kit Monitoring Checklist was utilized to inspect the items in the first aid kit. The monitoring was conducted on a monthly basis, with the most recent dates being: 12/06/2024, 12/05/2024, 12/04/2024, 12/03/2024, 10/02/2024, and 10/01/2024. 5. During a site visit at the Engine Room in UIE POM and harvesting activity at UIE Estates, it was verified that the items in the first aid kit were in alignment with the First Aid Kit Monitoring Checklist and were still valid. 6. An interview with the Hospital Assistant (HA) affirmed that he is tasked with inspecting the items in the First Aid Kit in terms of their condition, sufficiency, and validity. He also disclosed that each first aid kit will be submitted to him on a monthly basis for inspection, which will be recorded using the latest First Aid Kit Monitoring Checklist. 7. Interviews with the selected PIC for the first aid kit confirmed that the training was conducted by the HA, with the most recent session conducted on 18/03/2024. From the interviews, it was verified that they comprehend how to utilize the first aid kit and understand the function of each item in the first aid kit. They also mentioned that the HA reminds them to submit the first aid kit to him on a monthly basis for inspection and monitoring purposes. <p>Based on the on-site verification, evidence, documents, and interviews with selected personnel, it can be concluded that the corrective action was implemented</p>

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	effectively. Consequently, the Minor finding raised during the Annual Surveillance Assessment (2_1) in 2023 was closed.
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Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: N/A Verification / Follow-up actions: N/A

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2206324-202205-M1	Critical	3.6.1	03/06/2022	Closed on 29/08/2022
2206324-202205-N1	Minor	3.3.2	03/06/2022	Closed on 27/07/2023
2373358-202307-N1	Minor	6.7.2	27/07/2023	Closed on 05/07/2024
2517499-202407-N1	Minor	7.3.1	05/07/2024	"Open"

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss United Plantations Berhad UIE POM and Estate Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

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Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor	Mr. Pang See Hock/PSH Enterprise	Face to face
Contractor	Mr. K.Kumar/K.Kumar Excavator	Face to face
Internal	Mdm. Kasturi a/p Sannasee Naidu/Mill Canteen	Face to face
Internal	Mr. Chan Kang Chew/UIE Mini Mart	Face to face
Contractor	Mr. Kalai/Sri Naresh Agency	Phone interview
Local Communities	Mr. Zamiaiman Hashim/Surau Committee	Face to face
Local Communities	Mr. S Tamil Selvi/Temple Committee	Face to Face
Internal	Mr. Chew Koon Ong/Sundry Shop	Face to face
Local Communities	Mr. Manaf/ Kampung Tebuk Yan	Phone interview
Local Communities	Mr. Zulkarnain/Kampung Lubok Pusing	Phone interview
Government Department	Mdm. Norliza/Department of Environment (DOE) Teluk Intan, Perak	Phone interview
Government Department	Mr. Shahzami/Department of Occupational Safety and Health (DOSH) Ipoh, Perak	Phone interview
Internal	Mill and Estate Workers (Local and Foreign)	Face to face
Internal	Gender Committee Representatives	Face to face
Internal	Workers Representatives	Face to face

Stakeholders comment	
1	<p>Feedbacks: Contractor</p> <p>They informed that they have signed agreement with the company before providing any services. Terms and conditions were briefed to them such as the compliance of legal requirements and RSPO requirements. They informed that they do not employ any child labour. They are aware of the complaint procedure. The payment made by the company was in timely manner. They are also aware on code of conduct policy where the company will not tolerate with any breach of ethical conduct such as bribery and fraud cases.</p> <p>Audit Team verification and response:</p> <p>No further issue.</p>
2	<p>Feedbacks: Local Communities</p> <p>They informed that there was no land dispute issue reported. Trenches were constructed to demarcate the boundaries. No encroachment by UIE estate. They informed that the operations in the estates and mill have</p>

	<p>not affected their daily life. The company also provide job opportunity to the local communities. They have been invited to attend stakeholder meeting. They hope that the good relationship with the estate can be maintained.</p> <p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: Sundry Shop and Mill Canteen</p> <p>They informed that the management from the estates and mill are very attentive and supportive. The management assists whenever they requested any assistance particularly for maintenance of their shops and canteen. They have good relationship with the management and are aware of the channel for lodging complaint and grievances. They also informed that no child labour was sighted in the estates. In addition, they mentioned that the price of food and all item in the sundry were displayed, and management consistently monitors the price of supplies at the shop.</p> <p>Audit Team verification and response: No further issue.</p>
4	<p>Feedbacks: Estate and Mill Workers (Local and Foreign)</p> <p>Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by operating unit. Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract so far.</p> <p>Audit Team verification and response: No further issue.</p>
5	<p>Feedbacks: Temple and Surau Committee</p> <p>Both mentioned that the temple and surau constructed on land owned by UIE business units and has been given for free. The management of UIE business units support the temple operation by assisting grass cutting or any repair. The management also grants access to the outsider for religious events held at the temple. For Surau, the management also provides support and assistance where is needed.</p> <p>Audit Team verification and response: No further issue.</p>
6	<p>Feedbacks: Gender Committee Representatives</p> <p>They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. They were also informed that they are treated equally and given same opportunity as the male such as promotion as mandore in the estate. Gender committee's member were elected freely. They are happy to work in UIE Business Unit as the management always shows concern regarding the workers welfare. They also informed no new mother in UIE Business Unit. Transporting to school for children provided by the management at zero cost.</p> <p>Audit Team verification and response: No further issue.</p>

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7	<p>Feedbacks: Workers Representatives</p> <p>They informed that they were elected by the workers freely. There was no issue reported by the workers during the time of audit. If there is any issue, they will discuss with management and action will be taken to resolve the issue. The workers were paid according to Minimum Wage Order 2022. There is no discrimination happened in the operating units as the management treated everyone the same. Overtime was offered voluntarily basis.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
8	<p>Feedbacks: Department of Environment (DOE) Teluk Intan, Perak.</p> <p>She informed that mill under United Plantation Berhad always maintains a high standard to comply with the laws and regulations enforced by DOE. The latest environment inspection was conducted on 29/05/2024 and no hard issues found during the inspection. Quarterly report and any report submission required by the DOE has been submitted by the UIE POM within given timeframe.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>
9	<p>Feedbacks: Department of Occupational Safety and Health (DOSH) Ipoh, Perak.</p> <p>He informed that there is relatively positive engagement between the company and the Department. He also confirmed that the company has been occasionally visit by the Department. Latest visit to the UIE Business Unit was on 21/05/2024. United Plantation Berhad faces no issue in complying with laws and regulations enforced by the DOSH.</p>
	<p>Audit Team verification and response:</p> <p>No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estate already underwent two cycles of replanting					



Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Lee Kian Wei
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: United Plantations Berhad
Title: Lead auditor	Title: Manager, Sustainability
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 12/07/2024	Date: 12/07/2024

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>The documents that are specified in the RSPO P&C were made available on site upon request at UIE Business Unit. Estate and mill under UIE Business Unit adopted with the 'Policy on documents that can be publicly available' dated 11/01/2014 which has been signed by Chief Executive Director. The policy has specified the list types of document that can be requested by stakeholders to in line with the company's commitment on transparency. Among of the documents publicly available upon request are including land titles, occupational health and safety plans, plan and impacts assessment relating to environment and social impacts, HCV documentations, pollution prevention and reduction plans, detailed of complaints grievances, negotiation procedures, continual improvement plans as well as the Human Right Policy.</p> <p>Furthermore, sustainability report, annual report, corporate governance report sustainability policies, and grievance redressal procedure are published in the company's website; https://unitedplantations.com/sustainability/ and https://unitedplantations.com/investor-relations/ . The website is accessible to the public.</p> <p>In addition, the procedures entitled 'Standard Operating Procedures – Stakeholder Engagement' dated 09/04/2021 was established to manage responses to information requested by</p>	Complied

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		<p>stakeholders. Among other things, the procedures outlines that any request and responses from internal and external stakeholders may be expressed verbally or in writing. All request from stakeholders will be recorded in the stakeholder logbook. Other than that, policy and procedure were found displayed at workstation and muster ground.</p>	
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -</p>	<p>Information is available in appropriate languages and accessible to relevant stakeholders, including both internal and external stakeholder. For external stakeholders, information was provided through stakeholder meeting conducted on 23/05/2024 and attended by government authorities, local communities, neighbouring estates and village, and contractor. While for internal stakeholders, information was provided through various meeting such as OSH meeting, employee welfare committee meeting and gender meeting as well as during morning muster conducted at the UIE Business Unit.</p> <p>Grievance procedure, fire prevention, policies and social & environmental impact assessment were briefed and discussed in the meeting with internal and external stakeholders. The meeting was given by Sustainability Officers from HRSS in Malay language which is understand by the relevant stakeholder. Any concern or complaints can also be forwarded during the meeting. This also has been verified through interview with sampled stakeholders conducted during the audit.</p> <p>Furthermore, information particularly company policies (in English, Malay, Tamil and Benggali) can be seen in the strategic area within estate and mill compound. Standard Operating Procedure (SOP) are also has been displayed at the workstation area as an information for workers. Moreover, if information is required in other languages, management will provide explanations in the</p>	<p>Complied</p>

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		appropriate language. This was confirmed during interviews with sampled workers from Indonesia, Bangladesh, India and Nepal with the assistance from the worker’s representative by nationality.	
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>UIE Business Unit were able to demonstrate that records of requests for information and responses were maintained. As specified in the procedures entitled ‘Standard Operating Procedures – Stakeholder Engagement’ dated 09/04/2021 was established to manage responses to information requested by stakeholders. Among other things, the procedures outlines that any request and responses from internal and external stakeholders may be expressed verbally or in writing. All request from stakeholders will be recorded in the stakeholder logbook.</p> <p>Reviewed the stakeholder logbook found that most of the requests were related repairing for worker quarters. However, requests related to compliance inspection from governments authorities such as Department of Safety and Health (DOSH) and Department of Environment (DOE) were recorded in the DOSH logbook and DOE visit report, respectively. It was verified that the management of the respective units have responded in a constructive and timely manner where evidence of response being provided. This was confirmed during interview with sampled workers and relevant stakeholders during the audit. Reviewed of documents also found that all requests were properly maintained.</p>	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	United Plantation Berhad has established a procedure entitled ‘Standard Operating Procedures – Stakeholders Engagement’ dated 09/04/2021, as a documented consultation and communication procedure. Estate and mill under the UIE Business Unit adopted this procedure as a guide for communication and consultation with internal and external	Complied

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		<p>stakeholders. The procedure details the process of handling complaints from stakeholders and the time frame for internal and external communication to be addressed.</p> <p>In addition to the existing procedure, Grievance Redressal Procedure has been established to recognize the value and importance of communication and consultation in clearing misunderstanding/conflicts/grievances or raising any issues with the company. This procedure is adopted, in an effective, timely and appropriate manner that is open and transparent to any internal and external stakeholders. This procedure was found accessible for the public in website: https://unitedplantations.com/employees/#Grievance-Redressal-Procedure.</p> <p>All the above procedure has been communicated to the relevant stakeholder at estate and mill under the UIE Business Unit during stakeholder meeting. Latest stakeholder consultation meeting was conducted on 23/05/2024, attended by government authorities, local communities, neighbouring estates and village, and contractor. Discussion and feedback were recorded in the minutes of meeting.</p> <p>Furthermore, UIE Business Unit has appointed person responsible for RSPO who is also accountable for any issues related to the social within the operating unit. The Estate Director, Downriver is appointed as person responsible for RSPO related matters as evident in the appointment letter dated 29/03/2018 signed by Chief Executive Director.</p> <p>It was confirmed during the interview with the sampled stakeholders and workers that they have been explained the gist and essence of the above SOP and procedure.</p>	
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1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders for internal and external parties maintained up to date as of 02/2024 at estate and mill under the UIE Business Unit and found listed stakeholder from various categories such as government bodies, service providers/contractors/suppliers, neighbouring community/plantation/smallholders, estate community/estate representatives. The stakeholder list is listed information on the name of stakeholders, contact name, address, and contact number.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>United Plantations Berhad has established Code of Conduct and Business Ethics Policy, dated 14/12/2019 and signed by Chief Executive Director. The policy is applicable to all employees, board of director, business associates such as contractor and subcontractor. This policy is adopted by the estate and mill under the UIE Business Unit. Among other points, the policy emphasizes the following:</p> <ul style="list-style-type: none"> • Conduct the operations with honesty, integrity, and openness, and with respect for the human rights and interests of employees. • Directors and employees are required to comply with the law and regulations. • Will conduct operations in accordance with internationally accepted ethics of good corporate governance. • Employees will conduct operations in accordance with the principles of fair competition and all applicable regulations. <p>In addition, there is a commitment under Business Integrity and Corruption in the policy, stating that the company has a zero tolerance to fraud, bribery and corruption and this applies to all</p>	Complied

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		<p>dealings by the employees, suppliers, consultants, agents and any person associated with company. Furthermore, under Conflicts of Interests in the policy, it is mentioned all directors and employees are expected to avoid personal activities and financial interests which would be in conflict with their responsibilities to the company and they must not seek gain for themselves or others through misuse of their positions.</p> <p>The company's website among other has disclosed the Corporate Governance Report the year ending 31/12/2023 and one of the intended outcome of the report is to promoting good business and maintaining a healthy corporate culture that engenders integrity, transparency, and fairness. In addition, briefing of the above policy was conducted during stakeholder meeting on 23/05/2024. Evidence of the briefing, such as attendance records and photos, was seen.</p> <p>Estate and mill under the UIE Business Unit require all contractors and vendors to implement by signing the contract agreement document prior to commencing work. Review of sample contract agreement with contractor and recruitment agents found that there is a clause specifying that the contractor and vendors shall adhere with the Code of Conduct and Business Ethics Policy. Interview with sampled contractors conducted during the audit indicate that they are understand the gist and essence of the policy.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>At the estate and mill under UIE Business Unit, among the system in place to monitor compliance include:</p> <ul style="list-style-type: none"> - Financial internal audit conducted by Internal Audit Department on 01/04/2024, covering the implementation of company's procedures and policies and ensuring there 	Complied

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		<p>are no fraudulent cases based on the record of payment, etc.</p> <ul style="list-style-type: none"> - Sustainability Internal Audit conducted by internal auditors from Human Resource, Sustainability & Safety (HRSS) Department, covering RSPO implementation. This audit ensures that management is effectively monitoring the compliance and policy implementation by the counterparties. - Third-party financial audits conducted by EY and KPMG from 23-27/10/2023 and 22/04/2024 to 10/05/2024, respectively. The purpose of this audit is to cover elements of code of ethics and integrity including aspects such as mill operations, estate operations, procurement and payment, inventory management, payroll processing, fixed asset management and check roll management. <p>Based on results of the above audit, there are no findings related to ethical conduct raised.</p>	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>UIE Business Unit continued to comply with legal requirements for estates and mill operation. Permit and license checked:</p> <p>i) UIE POM's Compliance Schedule, license no. JAS.ATI.600-3/1/98, validity from 1/01/2023 – 30/06/2024. Method of POME disposal is land application with BOD₃ limit @ 5000 mg/l. The new license is still the process of renewal. Refer to letter dated 13/6/2024 to DOE and payment voucher dated 15/06/2024 on the proof of renewal process.</p>	Complied

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		<p>ii) 3rd party environmental audits. Audit date (19/03/2024), report date (2/04/2024), report reference, DPKR/0324/6363. Only 1 observation raised. Audit carried out environmental license assessor, EA 0047, CESSWI:4482. No NC and observation raised. Audit carried out environmental license assessor, EA 0047, CESSWI:4482.</p> <p>iii) List of competent persons</p> <table border="1" data-bbox="1137 651 1883 1319"> <thead> <tr> <th>Competency</th> <th>Certificate reference</th> <th>Validity period</th> </tr> </thead> <tbody> <tr> <td>CePPOME (Certified Professional in Palm Oil Mill Effluent)</td> <td>CePPOME/2424100</td> <td>11/01/0224 - 10/01/2025</td> </tr> <tr> <td>CePSWaM (Certified Professional in Scheduled Waste Management)</td> <td>CePSWaM/04202</td> <td>Effective from 16/12/2020</td> </tr> <tr> <td>Electrical chargineman, B0</td> <td>P-J-T-6-B-0314-2017</td> <td>Valid until 24/01/29</td> </tr> <tr> <td>Steam Engineer, Grade 1</td> <td>072/2016</td> <td>Effective from 16/04/2016</td> </tr> </tbody> </table>	Competency	Certificate reference	Validity period	CePPOME (Certified Professional in Palm Oil Mill Effluent)	CePPOME/2424100	11/01/0224 - 10/01/2025	CePSWaM (Certified Professional in Scheduled Waste Management)	CePSWaM/04202	Effective from 16/12/2020	Electrical chargineman, B0	P-J-T-6-B-0314-2017	Valid until 24/01/29	Steam Engineer, Grade 1	072/2016	Effective from 16/04/2016	
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		Steam Engineer, Grade 2	JKKP/2022/JS02/234	Effective from 2/11/2022
		Engine driver, grade 1	PK61/95	Effective from 29/08/1995
		Engine driver, grade 1	PK 84/94	Effective from 30/09/1994
		AESP	NW-NRO-AE-R-0732-W	12/02/2026
		AGT	NW-NRO-AGT-0170-V	17/05/2025
		iv) Energy Commission, Private electrical installation, no. 63150, license no. 2023/02338 for 4,573.75 kW and valid from 21/10/2023 – 20/10/2024.		
		v) MPOB license no. 500124504000 with 350,000 mt processing capacity and valid for 1 year (1/02/2024 – 31/01/2025)		
		vi) Steam boiler (SB) and Unfired Pressure Vessel (UPV) inspection was carried out on 21/05/2024 by DOSH inspector. Sample of SB and UPV inspected:		
		CF number	Type of UPV and SB	License/CF validity
		PK PMD 3869	Steam boiler no.2	1/08/2025
		PK PMD 8263	Steam boiler no.3	1/08/2025
		PK PMD 80415	Steam boiler no.4	28/02/2025
PK PMA 35014	Crane no.1	1/08/2025		
PK PMA 35015	Crane no.2	1/08/2025		

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		<table border="1"> <tr> <td>PK PMA 35012</td> <td>Crane no.3</td> <td>1/08/2025</td> </tr> <tr> <td>PK PMA 35013</td> <td>Crane no.4</td> <td>1/08/2025</td> </tr> <tr> <td>PK PMT 4586</td> <td>Sterilizer</td> <td>1/08/2025</td> </tr> <tr> <td>PK PMT 6254</td> <td>Sterilizer</td> <td>1/08/2025</td> </tr> <tr> <td>PK PMT 5310</td> <td>Sterilizer</td> <td>1/08/2025</td> </tr> <tr> <td>PK PMT 4253</td> <td>Sterilizer</td> <td>1/08/2025</td> </tr> <tr> <td>PK PMT 5304</td> <td>Sterilizer</td> <td>1/08/2025</td> </tr> </table>	PK PMA 35012	Crane no.3	1/08/2025	PK PMA 35013	Crane no.4	1/08/2025	PK PMT 4586	Sterilizer	1/08/2025	PK PMT 6254	Sterilizer	1/08/2025	PK PMT 5310	Sterilizer	1/08/2025	PK PMT 4253	Sterilizer	1/08/2025	PK PMT 5304	Sterilizer	1/08/2025	
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		<p>Based on DOSH comments in the logbook, all machinery inspected all in serviceable condition. No notice issued by DOSH with regards to SB and UPV inspection.</p> <p>vii) Diesel and petrol permit, serial no. A003302, ref no. MJG/SK/D/04, diesel quantity: 47,000 litre, petrol: 15,000 litre valid until 24/08/2024.</p> <p>viii) Permit to Purchase, Store and Use of Sodium Hydroxide, Permit no. 011011, register no. AC0038/2024 valid until 31/12/2024.</p> <p>xi) Permit for Overtime Restriction, Section 60A(4)(a) Employment Act 1955 maximum limit per month: 130 hours effective from 19/03/2015, ref:(35) JTK. PK (1) PMT (SEK.60)/10805</p> <p>x) DOE citation report, JAS/ATOP1/08/2015 dated 29/05/2024. No non-compliance issue raised based on the report.</p> <p><u>UIE Estate</u></p> <p>i) MPOB license no. 502076202000 with 10,365.2 ha and valid for 1 year (1/08/2024 – 31/07/2025)</p>																						

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		<p>ii) MPOB nursery license no. 622235011000 valid from 19/10/2023 – 30 /09/2024 (production, store, selling and moving of SLGBIJI)</p> <p>iii) Diesel Permit, ref: MJG/SK/D/04, serial no. A003302, diesel storage capacity: 47,500 litre, petrol:15,000 litre valid from 21/08/21 to 24/08/24.</p> <p>iv) Certificate of fitness (CF), for air compressor, PK PMT 3822</p>										
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The management continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the UP’s operation. Each office of the operating unit (mill and estates) has its own legal register and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers’ Minimum Standard of Housing and Amenities Act. Tracking changes in law updated by HREHS team. Latest change of law was done on 19th June 2024 for Environment Quality (Amendment) Act 2024.</p>	Complied									
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>All operating units have established a legal boundary based on the land title that they possessed. The boundary has been demarcated with boundary stones, boundary markers, security trenches and security fences. Observed during visit the following estate’s boundary verified:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Location</th> <th style="width: 15%;">Field no.</th> <th style="width: 55%;">Remarks</th> </tr> </thead> <tbody> <tr> <td>Canal A outlet</td> <td style="text-align: center;">48</td> <td>Boundary with smallholder (Kg Che Putih)</td> </tr> <tr> <td>Canal E outlet</td> <td style="text-align: center;">57</td> <td>Boundary with smallholder (Pulau Meranti)</td> </tr> </tbody> </table>	Location	Field no.	Remarks	Canal A outlet	48	Boundary with smallholder (Kg Che Putih)	Canal E outlet	57	Boundary with smallholder (Pulau Meranti)	Complied
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		Sg Anak Machang	90	Boundary with plantation (KLK)	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.					
2.2.1	A list of contracted parties is maintained. - Minor compliance -	Estate and mill under the UIE Business Units maintains its own stakeholder list in Stakeholders List for 2024, which includes an information of contracted parties. Information such as names and addresses of the contractor, as well as the contact number/PIC for each contractor are included in the list. The lists were made available for verification during the audit.			Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	<p>Samples of contracts for estate and mill under UIE Business Unit were verified to contain clauses on meeting applicable legal requirements. Inside the contract mentions that the contractor shall adhere to the current applicable laws and regulations, e.g., Environmental Quality Act, Occupational Safety and health Act, Employment Act, Wages Council Act, Road transport Act and any other applicable laws. Example of verified contract agreements are as follows:</p> <ul style="list-style-type: none"> - Contract agreement for transporting crude palm oil: Sakthy Transport Sdn Bhd, date of agreement: 01/01/2024 to 31/12/2024. - Contract agreement for transporting crude palm oil: Sri Naresh Agency, date of agreement: 01/01/2024 to 31/12/2024. - Contract agreement for hiring excavator, desilting drain: K. Kumar Excavator, date of agreement: 01/01/2024 to 31/12/2024. - Contract agreement for hiring excavator, desilting drain: PSH Enterprise, date of agreement: 01/01/2024 to 31/12/2024. 			Complied

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		Evidence of legal due diligence was also available for the above-mentioned contractors. This includes verifying dates of contractor workers salary payment, employment contracts, SOCSO and EPF contribution and workers' payslip. Interviewed with the sampled contractors conducted during the audit indicate that they are aware of the terms and conditions outlined in the agreement and comply accordingly.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	It was verified that all contracts agreement as mentioned in indicator 2.2.2, include clauses or elements for disallowing child, forced and trafficked labour. This clauses state that the contractor shall adhere to the attached company policies i.e., Human Right Policy (e.g., no child labour, no forced and trafficked labour, and equal opportunities). Review the contractor documents such as workers' payslip, employment contract, SOCSO 8A form and EPF contribution form found that there is no young person were employed by the contractors. This was also verified during site visit and interview with sampled contractors during the audit.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license - Critical (Major) compliance -	As per verification on UP UIE Mill FFB Source was only from UP plantation cause the mill is under IP. As per verification all record of such as geo location, ownership record, MPOB license is available as per document review.	Complied

2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	No indirectly sourced FFB as UIE POM is under Identity Preserved module.	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	The UIE POM business plan is documented in accordance with the Annual Budget for 2024, 2025, and 2026. It includes Operating Revenue, Total Working Profit, and a comparison of Crop & Cost for the years 2024 - 2028. The business management plan established by UIE POM includes the following details: <ol style="list-style-type: none"> 1. FFB received projection from the supply base estates 2. Oil Extraction Rate (OER) 3. Kernel Extraction Rate (KER) 4. Operation Cost 5. Capital Expenditures 6. General Charges UIE Estates are implementing a concept similar to UIE POM. The business management plan established by UIE Estates includes the following details: <ol style="list-style-type: none"> 1. FFB projection from each block 2. Income and expenditure 3. Sundry Revenue 4. Operation Cost 5. Capital Expenditures 	Complied

		<p>6. General Charges 7. Hectarage Statement</p> <p>As there are no scheme smallholders at the site, there is no jointly developed business plan between the mill and the scheme smallholders.</p>	
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>UIE Estates is adopting the procedure that has been established by the management of UP. This procedure is documented in the Standard Operating Procedure (SOP) for Replanting, which was issued on the 10/12/2007.</p> <p>The forthcoming replanting programme is slated to commence in the year 2035. The most recent instance of replanting was executed in the year 2017. Consequently, there are no projections available for the forthcoming five years.</p> <p>However, it should be noted that the ultimate decision pertaining to the replanting programme resides with the top management.</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>UIE Palm Oil Mill and UIE Estates are committed to conducting the Management Review Meeting on an annual basis. This meeting is scheduled to take place after the internal audit and before the external audit.</p> <p>The Sustainability & Supply Chain Management Review for 2023 was conducted by the UIE Palm Oil Mill on 22/04/2024. The meeting was presided over by the Resident Engineer and attended by key personnel responsible for the implementation of the RSPO standard. The minutes maintained by the POM management reveal that the following agenda items were discussed during the management review:</p> <ol style="list-style-type: none"> 1. Applicable Laws and Regulations (Tracking of Laws) 	Complied

		<ol style="list-style-type: none"> 2. Business Plan (Annual Budget) 3. Environmental Impact Assessment (EIA) 4. Energy Use (Diesel Use, Renewable Energy) 5. Scheduled Waste Management 6. Social Impact Assessment (SIA) 7. Stakeholders' Communication and Consultations 8. Complaints and Grievances 9. Internal Audit Findings (RSPO P&C, MSPO Part 4, and MSPO SCC) 10. External Audit Findings (RSPO P&C, MSPO Part 4, and MSPO SCC) 11. Process Performance and Product Conformity 12. Status of Corrective Action and Preventive Actions 13. Follow-Up Actions from Previous Management Review 14. Changes That Could Affect the Management System 15. Recommendations for Improvement <p>The Sustainability Management Review for 2023 was conducted by UIE Estates on 23/05/2024. The meeting was chaired by the Deputy Group Manager and attended by key personnel responsible for the implementation of the RSPO standard. The minutes maintained by the POM management reveal that the following agenda items were discussed during the management review:</p> <ol style="list-style-type: none"> 1. Applicable Laws and Regulations (Tracking of Laws) 2. Business Plan (Annual Budget) 3. Environmental Impact Assessment (EIA) 4. Energy Use (Diesel Use) 	
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		<ol style="list-style-type: none"> 5. Scheduled Waste Management 6. Social Impact Assessment (SIA) 7. Stakeholders' Communication and Consultations 8. Complaints and Grievances 9. Internal Audit Findings (RSPO P&C and MSPO Part 3) 10. External Audit Findings (RSPO P&C, MSPO Part 3) 11. Process Performance and Product Conformity 12. Status of Corrective Action and Preventive Actions 13. Follow-Up Actions from Previous Management Review 14. Changes That Could Affect the Management System 15. Recommendations for Improvement <p>The minutes of the Management Review Meeting for each operating unit are meticulously maintained by the respective management of the operating unit and are available for review upon request. Overall, the management review meeting for each operating unit is effectively implemented by the respective operating unit.</p>	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities. Continuous improvement plan (CIP) of main social impacts and environment impacts including following:</p> <ul style="list-style-type: none"> • Upgrading of old housing complex in phase and build new houses in line with Taman concept to ease congestions. 	Complied

		<ul style="list-style-type: none"> • Gender meeting held regularly. • Public advertisement on recruitment of local employee. • Conduct verification on guest workers to monitor if there are any issues for recruitment fee charged to the newly recruited workers. • Reduction of pesticides consumption. • Maintaining zero burning practice and ensure pollution and contamination was managed properly. • Ensuring operation and production budget does not overran. • To achieve the budgeted FFB production. • Continue to observe all SOPs to prevent occupational incidents 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of UIE POM Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2023 for (social and environment metrics) and economic metrics from June 2023 – May 2024 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management of UIE POM UoC has adopted the Standard Operating Procedures (SOPs) established by United Plantations Berhad. It has been verified that each operating unit of UIE POM UoC maintains these SOP documents, which have been confirmed to be in order.</p>	Complied

		<p>The SOPs for the plantation are documented as follow:</p> <ol style="list-style-type: none"> (1) Field Management Manual (2) Standard Operating Procedure - Engineering Department (3) Standard Working Procedure (S.O.P) (4) Occupational Safety and Health (OSH) Manual <p>For the palm oil mill, the Standard Operating Procedure from the Engineering Department is used as a guide for mill operations. The SOPs cover the following areas:</p> <ol style="list-style-type: none"> (1) Reception (2) Fruit Handling (3) Sterilization (4) Threshing (5) Empty Bunch Pressing (6) Digestion and Pressing (7) Clarification (8) Kernel Extraction (9) Boiler House (10) Engine Room (11) Raw Water Plant (12) Effluent Treatment and Waste Management (13) Laboratory (14) Store System (15) Workshop/Maintenance/Safety (16) Office Procedure (17) Biogas Plant 	
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		<p>(18) Traceability (19) Internal Audit (20) Recruitment of Guest Workers (21) Supply Chain</p> <p>For the implementation of the supply chain system, the Standard Operating Procedures titled "MSPO Supply Chain Model: Segregation" and "RSPO Supply Chain Module D – CPO Mills: Identity Preserved" (Revision No.: 10, Dated 01/10/2022) are followed.</p> <p>Relevant Key Performance Indicators (KPIs) have been specified for quality, environment, safety, and cost control at both the Palm Oil Mill (POM) and Estates. These KPIs serve as benchmarks for performance and continuous improvement.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The implementation of the Standard Operating Procedures (SOPs) at UIE POM UoC has been consistently performed and verified. This includes system monitoring through internal audits and operational activities such as daily, weekly, and monthly field inspections. The monitoring is carried out by trained and competent personnel, including the Human Resource, Sustainability & Safety (HRSS) Department for Sustainability Internal Audits, and Field Supervisors and experienced Mandores for field operations. Records of these operations are maintained by the respective staff and regularly checked and verified by the Assistant Manager and the Manager.</p> <p>In addition to internal checks, the estate and mill management also adopt practices such as visits from top management, including the Chief Executive Director, Director of Engineering Upstream, and Estates Director Downriver. Visits from</p>	Complied

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		<p>government agencies, primarily DOSH and DOE, further ensure the consistent implementation of procedures.</p> <p>The management of UIE POM UoC adheres to the SOP for Internal Audit (Rev. No. 01, dated 15/02/2019), which mandates that internal audits be conducted at least annually to effectively implement and maintain the respective standard requirements within the Group. As a result, a Sustainability Internal Audit was conducted on 21/02/2024 at UIE POM and on 20/02/2024 at UIE Estates by five Internal Auditors from the HRSS Department.</p> <p>Apart from the Sustainability Internal Audit, there are also Internal Audits conducted by the Internal Audit Department of UPB, with the most recent ones conducted in July 2022 at UIE Estates and in April 2023 at UIE POM. Financial Audits are also conducted by Ernst & Young Global Limited (EY), one of the largest professional services networks in the world, with the most recent audits conducted in October 2023 at UIE Estates and in January 2024 at UIE POM.</p> <p>Each operating unit is also visited by top management to ensure the SOPs are being implemented correctly. This is evidenced by the visit report dated 18/06/2024 at UIE Estates and 27/09/2023 at UIE POM.</p> <p>Government authorities also visit the operating units. For instance, the Department of Environment from the Teluk Intan Branch visited the UIE POM on 29/05/2024, and the Department of Occupational and Health for Perak State visited the UIE Estates on 19/06/2024.</p> <p>Overall, the mechanisms to ensure consistent implementation of procedures at UIE POM UoC are effectively implemented.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	Records of monitoring and corrective actions have been meticulously maintained for over 12 months at both the mill and	Complied

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	<p>- Minor Compliance -</p>	<p>estates. Daily muster chits and briefing records are readily available at the POM and estates. The actual operational and field activities were verified during on-site field inspections at the audited POM and estates.</p> <p>It has been confirmed that the estates maintain monitoring records on spraying, manuring, and harvesting operations. Similarly, the mill maintains monitoring records on the daily production report, which includes details such as FFB processed, ramp balance, throughput, starting and stopping time, and the boiler monitoring sheet. Other records such as the daily notification report on machinery status, and daily supervision and walkabouts by Supervisors and Assistant Managers, are also maintained and were available during the assessment at the estates and mill.</p> <p>Reports of visits from top management and government agencies are also appropriately maintained by the estates and POM management.</p> <p>The Internal Audit Report for UIE Palm Oil Mill, dated 04/03/2024, indicates that there were 4 NCs raised during the Sustainability Internal Audit. These were effectively addressed and closed by the POM management. Similarly, the Internal Audit Report for UIE Estates, dated 18/03/2024, shows that there were 24 NCs raised during the Sustainability Internal Audit, which were also addressed and closed effectively by the estates management.</p> <p>The Management Review Meeting minutes, which are properly maintained, provide evidence that the input from the internal audit findings was discussed to identify the effectiveness of the implementation of the RSPO P&C requirements.</p>	
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		The on-site audit confirmed that these records were satisfactorily maintained.	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting nor expending the existing ones conducted by UIE Estate as of the date of the audit. No additional methods have been implemented or introduced in the operations of the mill and estate under UIE Business Unit, which could potentially result in altered impacts on the social aspects. The social impacts arising from the mill and estate operations have remained consistent since last assessment.</p> <p>However, estate and mill under UIE Business Unit has conducted Social Impact Assessment on 23/04 and 23/05/2024 for external stakeholder and on 10/06/2024 for internal stakeholder. The methodology of the assessment was through field interview with the internal stakeholders which has been conducted by Human Resources, Sustainability and Safety (HRSS) department. For external stakeholders, the methodology involved consultation during stakeholders meeting and questionnaires provided to the stakeholders. The social impact is developed based on the scoring of severity, quantity, and probability. Social Management Plan will develop after the social impact established.</p> <p>Further verification in the SIA assessment also indicates that the assessment has focuses several key areas as follows:</p> <ul style="list-style-type: none"> • Access and Use Rights • Subsistence Activities/Amenities • Human Rights 	Complied

		<ul style="list-style-type: none"> • Cultural and Religious Activities • Medical Health Facilities • Education Facilities • Code of Conducts • Occupational Safety and Health • Housing and Amenities <p>Based on the assessment conducted, both negative and positive impacts were identified for UIE estate, while for UIE POM, no negative issues were raised by the internal and external stakeholders.</p> <p>Environmental impact assessment (EIA) has been reviewed on 23/04/2024 for UIE POM. The assessment has covered all operational activities including;</p> <ul style="list-style-type: none"> a) Weighbridge/FFB reception b) Sterilizer c) Crane/Stripping Station d) Kernel Station e) Boiler House f) Engine room/power house g) Effluent treatment system h) Waste Management i) Laboratory j) Raw Water Treatment Plant k) Workshop/maintenance/safety 	
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		<p>l) Biogas Plant m) Construction of housing and other related facilities in the estate</p> <p>Evaluation criteria set for the environmental risk assessment based on the matrix, Severity (S) x Quantity/Load (Q) x Probability (P) with the ranking hierarchy as per below table:</p> <table border="1" data-bbox="1283 580 1778 1016"> <thead> <tr> <th>Ranking (S X Q X P)</th> <th>Significance</th> </tr> </thead> <tbody> <tr> <td>57 – 64</td> <td>Critical</td> </tr> <tr> <td>43 – 56</td> <td>High</td> </tr> <tr> <td>29 – 49</td> <td>Medium</td> </tr> <tr> <td>15 – 28</td> <td>Low</td> </tr> <tr> <td>1 – 14</td> <td>Negligible</td> </tr> </tbody> </table> <p>UIE estate conducted Environmental impact assessment (EIA) for all estate operations and documented in the Environmental Risk Assessment for the existing routine operation in the estate covering the operations such as replanting, weeding, pruning, circle sanitation, EFB mulching, water management, road, paths and railways, boundary, P&D management, manuring, harvesting, mill drain connecting to Estate, Composting pit and line site water discharge. The analysis was reviewed on annually basis. Latest reviewed was conducted on 23/4/2024.</p>	Ranking (S X Q X P)	Significance	57 – 64	Critical	43 – 56	High	29 – 49	Medium	15 – 28	Low	1 – 14	Negligible	
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<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Reflecting to the indicator 3.4.1, estate and mill under UIE Business Units have conducted a Social Impact Assessment (SIA) and the assessment covering several key areas such as human rights, access and use rights, subsistence activities/amenities, cultural and religious activities, medical health facilities, education facilities, code of conducts, occupational safety and health and housing and amenities. Social Impact Assessment was conducted on 23/04 and 23/05/2024 for external stakeholder and on 10/06/2024 for internal stakeholder.</p> <p>The methodology of the assessment was through field interview with the internal stakeholders which has been conducted by Human Resources, Sustainability and Safety (HRSS) department. For external stakeholders, the methodology involved consultation during stakeholders meeting and questionnaires provided to the stakeholders. Any findings, whether positive or negative impacts, were incorporated into a management plan.</p> <p>For existing operation, the social management plans were developed and updated annually by the estate and mill under UIE Business Unit. The management plan developed consists of issues, social impact, impact, action plan, target date of completion, person in charge and status. Example of management plan developed are as below:</p> <p><u>UIE POM</u></p> <p>1) Issue arises: Utilities provided.</p> <p>Comments: All respondents are satisfied with the utilities provided</p>	<p>Complied</p>
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		<p>Impact: Positive</p> <p>Action Plan: Management will continue to provide good quality utilities to the employees by periodic maintenance on main water supply lines and ensuring all necessary utility payments are made on time.</p> <p>2) Issue arises: Transporting of children to school.</p> <p>Comments: All respondents have access to a nearby school for their children.</p> <p>Impact: Positive</p> <p>Action Plan: Management will continue to ensure that the children of employees have access to education.</p> <p><u>UIE Estate</u></p> <p>1) Social Impact: Turnover of guest workers</p> <p>Impact: Negative</p> <p>Action Plan: Management representative to conduct interview at source country to ensure guest workers are fully aware of working environment. Kit allowance (RM150) is provided to all new workers on day of reporting to work.</p> <p>2) Social Impact: Work conditions</p> <p>Impact: Positive</p> <p>Action Plan: Timely salary payment, adequate PPE and training and provide transport to work.</p> <p>The operating units have established the Environmental Management Plan based on the EIA conducted. The</p>	
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		<p>management plan was reviewed on annually basis during EIA review. Environmental Management Plan 2024 dated 23/04/2024 has included details of mitigation of the negative impacts summarized as per below example:</p>																
		<table border="1"> <thead> <tr> <th data-bbox="1146 496 1317 587">Activities/ operation</th> <th data-bbox="1317 496 1563 587">Impact</th> <th data-bbox="1563 496 1912 587">Management Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1146 587 1317 948" rowspan="3">Boiler house</td> <td data-bbox="1317 587 1563 703">Dush/ash particles carried over by flue gas (air pollution)</td> <td data-bbox="1563 587 1912 703">Installation of dust collectors and smoke density monitoring system</td> </tr> <tr> <td data-bbox="1317 703 1563 820">Boiler Ash generation and disposal</td> <td data-bbox="1563 703 1912 820">Utilize as field road patching</td> </tr> <tr> <td data-bbox="1317 820 1563 948">Water footprint</td> <td data-bbox="1563 820 1912 948">Installation of water flow meter Leakage management</td> </tr> <tr> <td data-bbox="1146 948 1317 1385" rowspan="2">Effluent treatment plan</td> <td data-bbox="1317 948 1563 1114">Effluent BOD < 5,000 ppm to land application</td> <td data-bbox="1563 948 1912 1114">Regular desludging and disposal to land application furrows. Annual desilting</td> </tr> <tr> <td data-bbox="1317 1114 1563 1385">Effluent BOD < 100 ppm to river</td> <td data-bbox="1563 1114 1912 1385">Regular desludging and disposal to land application furrows. Annual desilting Monitoring of upstream and downstream of nearby river on quarterly basis.</td> </tr> </tbody> </table>	Activities/ operation	Impact	Management Plan	Boiler house	Dush/ash particles carried over by flue gas (air pollution)	Installation of dust collectors and smoke density monitoring system	Boiler Ash generation and disposal	Utilize as field road patching	Water footprint	Installation of water flow meter Leakage management	Effluent treatment plan	Effluent BOD < 5,000 ppm to land application	Regular desludging and disposal to land application furrows. Annual desilting	Effluent BOD < 100 ppm to river	Regular desludging and disposal to land application furrows. Annual desilting Monitoring of upstream and downstream of nearby river on quarterly basis.	
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		CPO spillage	Maintain and enhanced oil trap	
		Disposal of sludge oil	Sold to license sludge oil buyers	
		EFB ramp leachate	EFB yard drain construction and channel the leachate to effluent pond	
		The periodic monitoring was carried out during Environmental Performance Monitoring Committee (EPMC) meeting on 25/06/24		
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The management plan is established based on operations and is reviewed and updated annually with the participation of affected stakeholders, both internal and external stakeholders, based on feedback and issues collected during stakeholder meeting, field interview and questionnaires provided to the stakeholders. Verification shows evidence that all issues highlighted in the social impact assessment and management plan have been addressed, as confirmed through document reviews. Further confirmation through interview with sampled of workers and affected stakeholders indicates that management resolves issues promptly and no recurring issues have occurred.</p> <p>Details of management and monitoring plan review and updated on annual basis with participation of internal and external stakeholders. Medium such as Environmental Performance Monitoring Committee EPMC and stakeholder meeting were utilized to capture all inputs highlighted by the stakeholders.</p>		Complied
<p>Criterion 3.5: A system for managing human resources is in place.</p>				

<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>United Plantations Berhad has documented its employment procedure in two key documents, Standard Operating Procedure – Recruitment of Guest Workers, dated 31/03/2023 and Standard Operating Procedure – Recruitment of Local Workers, dated 31/03/2020. The procedure is made available during the audit and from interview with sampled workers indicate that they understand the essence of the procedure.</p> <p>As specified in the Standard Operating Procedure – Recruitment of Guest Workers, the company shall apply for quota via the Foreign Workers Centralised Management System (FWCMS) portal to recruit Guest Workers. The company will be called for an interview by Ministry of Human Resources at the One Stop Centre (OSC) to obtain the quota by presenting the necessary supporting documents such as MPOB license, company SSM and certificate of fitness of workers accommodation. Subsequently, the company pays the levy for the approved quota at Immigration Department. Attestation of job orders must be made at respective embassies of source countries. This is applicable for Indonesia, Nepal and Bangladesh quotas. For Indian, the demand letter and employment contract are through the Indian Government e-migrate. The demand letter should be signed by the respective embassies, the company and the recruiting agent. Accredited Recruiting Agent (ARA) will be selected by the company based on their reliability and integrity for Indonesia, Bangladesh and Nepal, while for Indian, the company and ARA must register with e-Migrate portal. Sources of candidates include recommendations by current guest worker under the Guest Workers Recommends Guest Workers Programme. Other sources of candidates are from grassroot level (Accredited Recruitment Agent/Approved External Parties/Embassies/Government Bodies) where the ARA or</p>	<p>Complied</p>
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		<p>external parties may gather potential candidates directly from village without involvement of sub-agents. The UP-Call Centre in Malaysia will be act as bridge between the workers from the village to the ARA to disseminate the job and scope of work at plantations and conduct pre-departure briefing.</p> <p>The selection and candidate criteria are spelt out in the procedures under section "candidates' criteria" and "interview and selection" of the SOP. Recruiting process initiated with phone call from call centre, interview by representative by HRSS department. Once the candidate selected, the next process is to sign employment contract at origin country, providing explanation about the company and ensuring no recruitment fee is paid by the workers. The guest workers will undergo an orientation/induction programme upon their arrival at their respective estate and mill to get them familiarized with the new job, grievance procedure, environment issues, management representatives, amenities and work safety. Other contents explained in the procedure include:</p> <ul style="list-style-type: none"> • Workers completed contract agreement, exit interview, workers premature repatriation, workers abscondment and work permit. • Sources of candidates • Process of pre-departure and arrival, post arrival onboarding • Verification audit – Verification audit department of UP which is independent and is not involved in the recruitment process will conduct an internal audit to detect red flags, if any of newly arrived guest workers who may have made any payments during the recruitment process. 	
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		<p>For the process of hiring locals’ workers, the details have been specified in the Standard Operating Procedures – Recruitment of Local Workers. Job vacancies are advertised via MyFutureJobs portal for a period of 30 days. The interview reports for local candidates are submitted to PERKESO/SOCSO for further verification. The procedure also contains the following:</p> <ul style="list-style-type: none"> • Employment procedure on the termination of employees • Employment procedures on the retirement employees • Employment procedures on the retrenchment of employees 	
3.5.2	<p>Employment procedures are implemented, and records are maintained. - Minor Compliance -</p>	<p>Based on interview with sampled workers and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all records are adequately maintained. Induction process is mandatory to be carried out by operating unit to ensure company’s rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.</p> <p>At estate and mill under UIE Business Unit, sample of 2 new workers from India was verified. It was found the following is made available in each worker’s individual file:</p>	Complied

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		<ul style="list-style-type: none"> • Call centre questionnaire form • Declaration for guest workers referrals • Individual dossier checklist • Declaration for guest worker referrals guest recommend candidates from their native land. • Guest Worker acknowledgement letter • Candidate interview evaluation form • Upon arrival questionnaire of ethical recruitment • Guest workers acknowledgement letter for onboarding session <p>In addition, training for Accredited Recruitment Agent (ARA) were conducted by HRSS department. Training session were conducted 09/01/2024 and 10/05/2024 for Zaks International for India and PT Hamparan Insani for Indonesia, respectively.</p> <p>All the above are among the pre-requisites outlined in the recruitment procedure.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p><u>Hazard Identification, Risk Assessment, and Risk Control (HIRARC)</u></p> <p>The Hazard Identification, Risk Assessment, and Risk Control (HIRARC) for each operating unit of the UoC was established by referring to the Guidelines for Hazard Identification, Risk Assessment and Risk Control (HIRARC) – published by the Department of Occupational Safety and Health, Ministry of Human Resources Malaysia in 2008.</p> <p>The HIRARC was carried out on all operations where health and safety are an issue, in order to identify significant hazards and</p>	<p>Complied</p>

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		<p>implement control measures. Significant hazards that were identified and documented include noise exposure, pesticides/chemicals, accidents, fire, fuel spillage, working at heights, working in confined spaces, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc., and a "Permit to Work System" for the mill.</p> <p>For the UIE Palm Oil Mill, 53 HIRARCs were established based on workstations. The latest review was conducted on 11/02/2022. The latest revision of HIRARC for the POM was sampled and includes:</p> <ul style="list-style-type: none"> • Sterilizer Station (SOP No. SOP UIED 001, HIRARC No. HRC UIED 003) • Boiler Station (SOP No. SOP UIED 014, HIRARC No. HRC UIED 015) • Laboratory Operation (SOP No. SOP UIED 028, HIRARC No. HRC UIED 029) • Raw Water Treatment Plant (SOP No. SOP UIED 031, HIRARC No. HRC UIED 032) <p>For the UIE Estates, 43 HIRARCs were established based on estate activities. The latest review was conducted on 01/01/2023. The latest revision of HIRARC for the estate was sampled and includes:</p> <ul style="list-style-type: none"> • Mixing of Chemical (Ref. No. UPHE-010-04) • Harvesting Palm Oil (Ref. No. UPHE-010-14) • Locomotive (Ref. No. UPHE-010-15) • Spraying Pest & Disease (Ref. No. UPHE-010-30) 	
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		<ul style="list-style-type: none"> • Transporting Worker (Ref. No. UPHE-010-36) • Workshop (Ref. No. UPHE-010-41) • Travelling with Motorcycle (Ref. No. UPHE-010-42) <p>From the established HIRARC, it is clear that the POM and the estate management have conducted a thorough assessment of the HIRARC. Based on the site visit, interviews with selected personnel, and the review of the documentation, it is confirmed that the implementation of the HIRARC has been effectively carried out by the management.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>A CHRA was conducted at the mill and estates in compliance with the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000.</p> <p>For UIE POM, the CHRA was conducted by HQ/08/ASS/00/250 on 08/07/2019. The report (Ref. No. HQ/08/ASS/00/250-2019/022) stated that the assessment was conducted on six work units: Quality Control Laboratory Operators, Kernel Plant Operators, Boiler Water Treatment Operators, Raw Water Treatment Operators, Mechanical Fitters, and General Workers. An additional CHRA was conducted by HQ/08/ASS/00/250 on 09/08/2020. The report (Ref. No. HQ/08/ASS/00/250-2020/026) stated that the assessment was conducted on two work units: Laboratory Operators, and Engineering Operators. It was noted that the management has taken necessary actions based on the recommendations from the assessor, such as annual LEV assessment, annual CEM assessment, medical surveillance, and PPE usage, etc.</p>	
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		<p>For UIE Estates, the CHRA was carried out by HQ/09/ASS/00/250 on 08/07/2019 for ten work units: selecting spraying operators, cover crop purification operators, circle and path operators (immature field), circle and path operators (mature field), chemical weeding operators, P&D operators (mature field), P&D operators (nursery field), P&D operators (immature field), workshop operators, and storekeepers. A total of 43 chemicals were assessed in these work units. An additional CHRA was carried out by HQ/09/ASS/00/250 on 09/08/2020 for six work units: immature oil palm operators, immature oil palm P&D operators, mature oil palm P&D operators, fertilizer operators, circle spray operators, and workshop technicians. A total of 21 chemicals were assessed in these work units. Another additional CHRA was carried out by HQ/13/ASS/00/316 on 10/03/2023 for three work units: storekeepers, premixers, and pesticide control operators. A total of 1 chemical was assessed in these work units. It was noted that the management has taken necessary actions based on the recommendations from the assessor, such as medical surveillance and PPE usage, etc.</p> <p><u>Noise Risk Assessment (NRA):</u></p> <p>A Noise Risk Assessment (NRA) was conducted at both the mill and estates in compliance with the Occupational Safety and Health (Noise) Regulations 2019.</p> <p>For UIE POM, the NRA was conducted by HQ/07/PEB/00/74 on 07/03/2020. The report (Ref. No. HQ/07/PEB/00/74-2020/002) indicated that the Press Area, Crane Station, Kernel Plant, Oil Room, Sterilizer, USB Station, Boiler Room, Engine Room, and Biogas Engine exceeded the Noise Exposure Level (NEL) of 85 dB (A). It was noted that the management has taken necessary actions based on the recommendations from the assessor, such</p>	
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		<p>as conducting audiometric tests and ensuring the usage of Personal Hearing Protection (PHP), etc.</p> <p>For UIE Estates, the NRA was conducted by HQ/17/PEB/00/00011 on 13/07/2020. The noise risk assessment report (Ref. No. UPUIE2020-19.8) stated that tractor drivers, fitters, locomotive drivers, harvesters, and general workers were exposed to noise levels above the Noise Exposure Limit. It was noted that the management has taken necessary actions based on the recommendations from the assessor, such as conducting audiometric tests and ensuring the usage of PHP, etc.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>The UIE POM UoC has adopted the Occupational Safety and Health Policy, approved by the Chief Executive Director on 08/03/2021. This policy is a key document that is briefed during Stakeholders Dialogue Sessions, the latest of which was conducted on 23/05/2024. Internally, this policy is communicated through management meetings, training sessions, and briefings.</p> <p>The policy is also displayed in strategic areas within the premises, making it accessible to employees, contractors, service providers, suppliers, customers, and relevant stakeholders. It has been found that this policy aligns with the purpose and context of the organization and supports its strategic direction.</p> <p>The Annual Health and Safety Plan for the estate and mill is primarily implemented through the OSH Yearly Planner 2024 and monitored via inspections to address identified health and safety risks. The emphasis is on promoting safe work by providing:</p>	<p>OFI</p>

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		<ul style="list-style-type: none"> • Knowledge and skills needed to perform work safely and avoid creating hazards that could place themselves or others at risk. • Awareness and understanding of workplace hazards and how to identify, report, and control them. • Specialized training when work involves unique hazards. <p>In addition to formal classroom training, on-the-job training and worksite demonstrations are used to effectively convey safety concepts, ensure understanding of hazards and their controls, and promote good work practices.</p> <p>The safety performance of each Operating Unit is monitored through:</p> <ul style="list-style-type: none"> • Internal Audits conducted by the HRSS Department. • Monthly Work Site Inspections (WSI) by the site OSH Committee. • Direct involvement of supervisors and rounds by the Manager and Assistant Manager. • Safety incident reporting. • Health / medical surveillance. • Chemical exposure monitoring. • Audiometric Monitoring. • Daily Monitoring Checklists such as the PPE Checklist. <p>During the audit, the audiometric test result for the UIE POM, conducted on 08/03/2024 on 145 workers by HQ/18/DOC/00/00283, showed that all tested workers have normal hearing. The result was briefed to the workers on</p>	
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		<p>31/05/2024 by the Safety Officer. For UIE Estates, the audiometric test was conducted on 22/03/2024 on 87 workers by HQ/18/DOC/00/00283. The result, which showed that all tested workers have normal hearing, was briefed to the workers on 29/04/2024 by the Safety Officer.</p> <p>The Periodic Inspection, Examination, and Testing of the LEV System, conducted on 28/05/2024 by HQ/16/JHII/00/214 (Ref. No. HQ/16/JHII/00/214-2024/065), concluded that the Local Exhaust Ventilation (LEV) systems comply with ACGIH and USECHH Regulation 200 requirements and that airborne contaminants were effectively removed from the work area/production into the outside atmosphere. The management conducts monthly inspections to ensure the reliability of the LEV system to capture and contain the containment air from the hood at all times. The latest inspection of the LEV System Monitoring was conducted by the Lab Supervisor on 17/06/2024. It was noted that the management has taken necessary actions based on the recommendations from the report.</p> <p>Workplace Inspections are also conducted to ensure all workstations at each operating unit align with safety requirements. These inspections are done on a monthly basis, with the dates of inspection as follows: 3/06/2024; 20/05/2024; 16/04/2024; 13/03/2024; 03/02/2024; 19/01/2024.</p>	
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		<p>The results of monitoring are discussed at meetings, informed to employees, and where applicable, appropriate corrective actions are taken.</p> <p>As of now, the mill management has not yet received the report on the Chemical Exposure Monitoring, which was conducted from 12 to 13 June 2024. Consequently, an OFI has been raised to ensure follow-up on this matter during the next audit. The specific point to be verified is whether the recommendations from the report have been implemented by the POM management.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units have conducted a thorough Training Needs Analysis for all employees, management, and contractors. This analysis was based on job designation and the specific training required by each job type. The training needs were found to be gender-neutral, targeting all employees regardless of their gender, thus ensuring no gender bias in the training conducted.</p> <p>A comprehensive training program has been released for the year 2023/2024, based on feedback from previous programs and the analysis of which training was suitable. This program covers a wide range of topics, including safety and health, environmental and social aspects, RSPO Principles and Criteria, productivity, best management practices, and specific job skills related to each process station.</p> <p>The training program also includes refresher courses on all aspects of estate operating procedures and mill processes, from the felling of oil palms, nursery, replanting, harvesting, and upkeep of fields to the evacuation of Fresh Fruit Bunches (FFB) to the mill. At the mill, the training covers all processes from FFB</p>	<p>Complied</p>

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		<p>receipt, grading, processing to Crude Palm Oil (CPO), storage and dispatch of CPO, nut kernel, and the management of by-products, wastes, and waste streams. This also includes checking and documentation for traceability of the certified FFB, CPO, and Palm Kernel (PK).</p> <p>In addition to the Good Mill / Agricultural Practice training, the annual training program for 2023/2024 includes topics such as the OSH Act & regulations 1994, Environmental Quality Act 1974, induction program for new workers, OSH Committee and its function, First Aid Training, Scheduled waste training, RSPO P&C requirements, High Conservation Value (HCV) & Biodiversity training, mechanical/electrical workshop, environmental/safety & health policy/ environmental responsibility, Emergency Response drill, and social programs, including sexual harassment for male and female employees, needs of new mothers, etc.</p> <p>To assess the understanding of participants, various means have been implemented. These include participants completing post-training evaluation/feedback forms and giving suggestions, and knowledge acquisition and behavioural application rated by immediate supervisors at the workplace post-training. Random interviews with workers have confirmed their understanding of RSPO, the subsidiaries' policies, their work/job SOPs, the need to put on Personal Protective Equipment (PPE), the use of fire extinguishers, understanding workplace hazards, risks, and needed control measures, among others.</p> <p>The effectiveness of the training conducted has been verified through on-site interviews with the relevant Palm Oil Mill (POM) and estates personnel, confirming their understanding of the difference between Identity Preserved (IP) or Mass Balance (MB) modules. The documented training programs established as UIE Sustainability and Occupational Safety and Health (OSH) Training</p>	
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		<p>Programme 2023/2024 cover all estate and mill employees, including external stakeholders.</p> <p>This comprehensive approach ensures that all employees, regardless of their role, are equipped with the necessary knowledge and skills to perform their duties effectively and safely, in compliance with RSPO standards and environmental regulations.</p>	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The operating units have maintained comprehensive training records for each staff member and worker, including new employees hired in the year 2024.</p> <p>These records detail the RSPO Principles & Criteria (P&C) implementation training, providing a clear overview of the training conducted. Each record includes the name of the training, the date it was conducted, the name of the trainee, a list of employees trained, an evaluation record for each participant, and a summary of the training.</p> <p>For the UIE Palm Oil Mill, the following trainings were conducted:</p> <ul style="list-style-type: none"> • Briefing on OSH Policy, Environment Policy, Human Rights Policy (06/01/2024) • Fire Drill & Emergency Response (08/01/2024) • Air Lock Maintenance/Rotating Parts (10/01/2024) • Chemical Handling and Spillage Management at Workplace (19/06/2024) • Occupational First Aid Kit & CPR (AED) (10/06/2024) • Grievance Procedure (18/01/2024) • Fire Drill (30/06/2024) • Personal Protective Equipment (PPE) (07/06/2024) • Boiler (30/05/2024) 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Water Treatment (06/05/2024) • Lab Safety Data Sheet (SDS) (06/05/2024) • Biogas (20/04/2024) <p>For the UIE Estates, the following trainings were conducted:</p> <ul style="list-style-type: none"> • Fire Drill & Emergency Response Plan (ERP) (22/05/2024) • First Aid (18/03/2024) • Integrated Pest Management (IPM) Plans (13/03/2024) • Circle Sanitation (19/02/2024) • Chemical Premix (19/06/2024) • Road Safety (19/02/2024) • Pest & Disease (P&D) (25/01/2024) • Fresh Fruit Bunches (FFB) Evacuation (24/01/2024) • Spraying – Mechanization (18/01/2024) • Spraying – Manual (13/01/2024) • High Conservation Value (HCV) Awareness (19/01/2024) • Environmental Policy (19/01/2024) <p>Overall, the records of trainings conducted were properly maintained by each operating unit, ensuring that all employees are equipped with the necessary knowledge and skills to perform their duties effectively and safely.</p>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Supply Chain Training was conducted on 19/04/24 and attended by UIE POM and estate’s RSPO SCCS person in charge	Complied

	- Minor Compliance -		
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	UIE Palm Oil Mill is deemed to be Identity Preserved (IP) where the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C). For UIE POM, only one (1) single source of certified supplier namely UIE estate.	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Not applicable. UIE POM is under Identity Preserved	Not Applicable
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in Table 10 of this public summary report.	Complied

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	produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Shipping Department, Unitata Refinery. All transaction will be registered in the PalmTrace. The mill registered license available in PalmTrace as following: - Member ID: RSPO_PO1000000243 - Member category: Oil Mill - RSPO Membership No.: 1-0004-04-000-00 - License validity: 29/9/2023 – 28/9/2024	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<ul style="list-style-type: none"> a) Complete and up to date procedures established as Standard Operating Procedures; RSPO Supply Chain Module D – CPO Mills: Identity Preserved; Revision no. 11; Date: 30/08/2023 and Standard Operating Procedures – Traceability; Revision no. 01; Date: 15/2/2019. b) Complete and up to date records and reports available including the daily FFB received weighbridge tickets, daily production reports and Mill Supply Chain Accounting System spreadsheet etc. Training records has been maintained and recorded in the training attendance list title RSPO supply chain training conducted on 19/04/2024 with attendance from all operating units person in charge. c) Nominated person having overall responsibility and authority over the SCCS implementation is the UIE Engineering Department Head, Mr. N. Saravanaganes as per appointment letter dated 1st April 2021. Other personnel involved in the implementation of SCCS including the mill engineer, process supervisor, weighbridge clerk and lab assistant. 	Complied

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		d) Procedures for receiving and processing certified and non-certified FFBS documented in the Standard Operating Procedures; RSPO Supply Chain Module D – CPO Mills: Revision no. 11; Date: 30/08/2023 and Standard Operating Procedures – Traceability; Revision no. 01; Date: 15/2/2019.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p style="margin-left: 20px;">a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="margin-left: 20px;">b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Procedure to conduct internal audit documented in the Standard Operating Procedures; RSPO Supply Chain Module D – CPO Mills: Identity Preserved; Revision no. 11; Date: 30/08/2023. The procedure conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents and implemented accordingly with the latest internal audit was conducted on 21/02/2024.</p> <p>No non-conformities found during the latest internal audit for RSPO SCCS. Internal audit reports and relevant records maintained for review by management with latest management review meeting conducted on 22/04/2024</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Procedures for receiving and processing certified and non-certified FFBS documented in the Standard Operating Procedures; RSPO Supply Chain Module D – CPO Mills: Identity Preserved; Revision no. 11; Date:30/08/2023 and Standard Operating Procedures – Traceability; Revision no. 01; Date: 15/2/2019. Since the mill certified as IP, no non-certified FFB received and processed.</p> <p>Based last review period, the was no over-production recorded. The system is in place to trigger if the quota/certificate volume exceed using mass balance sheet and monitor on real time basis.</p>	Complied

		Procedure for handling non-conforming FFB and/or documents written under clause 13 of the SOP.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>UIE POM has ensured the required information/shipping document is available in document form.</p> <p>Based on sampled contract for CPO, [i.e. UCPOP20220130, contract volume: 1,000 mt], the following information was available:</p> <ul style="list-style-type: none"> The name and address of the buyer: XXX The name and address of the seller i.e. UIE POM The loading or shipment/delivery date: 20/12/2023, doc named Details of CPO despatch to Unitata, Delivery month December 2023 The date on which the documents were issued: 20/12/2023 A description of the product, including the applicable supply chain model, i.e. "certified sustainable CPO-IP" The quantity of the products delivered: 35.63 mt Related transport documentation, e.g. Despatch note: 0000194084 Supply chain certificate number of the seller e.g. in weighbridge ticket i.e. RSPO 693198 A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. (palm trace ID: TR-9101c661-d96d) <p>Based on sampled contract for PK, [i.e. UPKP202400006, contract volume: 3,261 mt], the following information was available:</p> <ul style="list-style-type: none"> The name and address of the buyer: XXX 	Complied

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		<ul style="list-style-type: none"> • The name and address of the seller i.e. UIE POM • The loading or shipment/delivery date: Delivery month February 2024. • The date on which the documents were issued: 9/03/24 • A description of the product, including the applicable supply chain model, i.e. "Certified Sustainable PK-IP" • The quantity of the products delivered: 34.64 mt • Related transport documentation, e.g. Despatch note: 0000198746 • Supply chain certificate number of the seller e.g. in weighbridge ticket i.e. RSPO 693198 <p>A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. (palm trace ID: TR-6f695ddc-a037)</p>	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>UIE POM has not outsourced its milling activities for processing of CPO. As to ensure the independent third party complies with relevant requirements of this RSPO Supply Chain Certification, agreement between Sri Naresh Agency and United Plantations Berhad, contract validity period from 1/01/2024 to 31/12/2024. Under contract terms and conditions has stipulated all pertinent requirements for RSPO SCCS specifically under clause m of the contract.</p> <p>a) United Plantations Berhad has legal ownership of all input material to be included in outsourced processes in this case for transportation of CPO.</p> <p>b) Stipulated under clause 18 of the said agreement.</p> <p>c) Documented control system with explicit procedures for the outsourced process has been communicated during contract signing, 15/01/23. The contractor has acknowledged and</p>	Complied

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	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>recorded in the undertaking checklist and verified during site audit.</p> <p>d) This requirement has been stipulated under clause 18 of the said agreement. 1</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	UIE POM record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractor appointed by United Plantations Berhad.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p>	<p>The retention period for traceability records are minimum 3 years as per the Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved.</p> <p>Complete and up to date records and reports available including the daily FFB received weighbridge tickets, daily production reports and Mill Supply Chain Accounting System spreadsheet etc. Records of training indicated that latest SCCS training was conducted on 19/04/2024 that involved operation supervisors of weighbridge, process and lab and other operating unit’s person in charge for RSPO SCCS.</p> <p>The Sustainability team will record and balance all the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis in the Mass Balance Sheet.</p>	Complied

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	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production was based on the actual performance of OER and KER. For the last review period; OER:21.6% KER: 4.07%</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>OER and KER was derived daily and aggregated monthly for reporting internally and externally to MPOB.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved has explained the processing of RSPO material to prohibit non-certified products processed. The mill is 100% received certified FFB from own certified supplying estates and produced 100% certified products. There are no non-certified materials will be received and processed as verified through the Daily FFB Reconciliation Record and Records of FFB Received (Division).</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>Shipping Announcement in the RSPO IT platform carried out by UIE POM when RSPO certified products are sold as certified to Unitata. Sample of transactions for CPO and PK as reported under indicator 3.8.8. Although no conventional or non-certified CPO and PK sold so far, UIE has the system in place to remove once RSPO volume sold as conventional or non-certified.</p>	Complied

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	ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>United Plantations Berhad has obtained RSPO Trademark License with licence no. 1-0004-04-100-00, license start date: 11/03/2024, expiration date: 10/03/2026. List of Supply Chain certificates that allowed to use the trademark logo are Jendarata POM, UJE POM, Ulu Bernam Optimill POM and Ulu Basir POM. United Planation Berhad only use the RSPO Trademark logo for general corporate communication.</p>	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	<p>United Plantations Berhad has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: http://www.unitedplantations.com/</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<p>United Plantations Berhad (UPB) has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: http://www.unitedplantations.com/.</p> <p>Additionally, in the website UPB displayed the RSPO trademark in digital format and link lead to the member's profile page; https://unitedplantations.com/certifications/#RSPO</p>	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No RSPO corporate logo used by UPB.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	United Plantations Berhad does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied

<p>4.5</p>	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> ● “We have been sourcing RSPO certified palm oil since (YEAR).” ● “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” ● “We have been RSPO certified since (YEAR).” ● “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” ● “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” ● “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” ● “We are RSPO certified. Ask us for our RSPO certified products.” 	<p>No misleading statement made by UPB as verified on the website</p>	<p>Complied</p>
<p>4.6</p>	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. 	<p>No misleading statement made by UPB to make product-related claims in their corporate communication as verified on the website</p>	<p>Complied</p>

	C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by UPB	Complied
5.1.2	Product-specific communications are voluntary.	No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by UPB	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	No RSPO label displayed for product-specific communications made by UIE POM	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	No RSPO label displayed for product-specific communications made by UIE POM	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below	Not applicable. UIE POM is not producing end products which involve retailers, traders or distributors.	Not Applicable

	<ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	Not applicable. UIE POM is not producing end products which involve retailers, traders or distributors.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	Off-pack claim made in any product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as mill/estate filing system and information in the website. The RSPO Label is used together with the valid trademark licence number 1-0004-04-100-00.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	If there is any physical RSPO claim, Shipping documentation will be verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e.	Complied

		product/commodity with SCC model (Certified Sustainable CPO/PK IP) and RSPO certificate number (RSPO 693198)	
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	UIE POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	Not applicable as no on pack claims made by UIE POM	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p>	Not applicable as no on pack claims made by UIE POM	Not Applicable

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	<ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by UIE POM	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by UIE POM	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by UIE POM	Not Applicable
5.3.3	On pack claims shall not include information about the claimant’s RSPO membership status.	Not applicable as no on pack claims made by UIE POM	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	Not applicable as no on pack claims made by UIE POM	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	Not applicable as no on pack claims made by UIE POM	Not Applicable

5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	Not applicable as no on pack claims made by UIE POM	Not Applicable
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 	UIE POM has not made any product-specific communications in any RSPO IP product claims.	Complied
Product-Specific Communications Labelling			

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	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	<p>UIE POM has not made any product-specific communications in any RSPO IP product claims.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantations Berhad has established Human Rights Policy, dated 09/03/2020 signed by Chief Executive Director. The policy emphasizes the commitment of the company to the protection and advancement of human rights including prohibiting retaliation, intimidation and harassment against Human Rights Defenders (HRD), whistleblowers, complainants and community spokespersons. This policy has been adopted by the estate and mill under UIE Business Unit. Other objectives outlined in the policy are as follows:</p> <ul style="list-style-type: none"> • To adhere the fundamental elements of International Labour Organization (ILO) Convention and the United Nations Declaration on Human Rights • To ensure all personnel are treated fairly and protected from any form of discrimination. • To ensure equal opportunities provided to all personnel. • Respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. • Respect the rights of people in communities impacted by estate and mill activities. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Respect land tenure right as well as recognize duties and responsibilities associated with tenure rights. • Resolve all complaints and grievances through an open, transparent and consultative process. • Will not tolerate the use of child or forced labour, slavery or human trafficking in plantations and facilities. <p>Further verification indicates that the above policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by several stakeholders consists of neighbouring, contractors, government bodies and local communities. The meeting was conducted combining all stakeholders in the UIE Business Unit.</p> <p>Reflecting to the above, feedback received from stakeholders' consultation conducted during the audit with sampled workers and several external stakeholders found, there is no issue raised related to the human right at estate and mill under UIE Business Unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by company even though they are not able to remember it word by word but is reflected in their working environment and the management always remind about it during morning muster and other training or meeting.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>As reflect earlier in indicator 4.1.1, estate and mill under UIE Business Unit prohibits any form of harassment by established the</p>	Complied

		<p>Human Rights Policy and communicated the policy to the internal and external stakeholder.</p> <p>No evidence found during the audit that the certification unit has instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>Based on the interview with the sampled workers and gender committee representatives, the estate and mill under UIE Business Unit are against any form of violence and prohibit such act from taking place in the certification unit. Any occurrence of violence and harassment from any level of employees including management will be reported and will not be tolerated. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers.</p> <p>Furthermore, the workers interviewed confirmed that no occurrence of harassment or violence has occurred that has come to their knowledge.</p>	
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantations Berhad has established procedure for complaint and grievance which is open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>Procedure for complaint and grievance has been established and documented in Internal Grievance Redressal Procedure and External Grievance Redressal Procedure. The procedure specified that the step to lodge complaints/grievance.</p>	<p>Complied</p>

		<p>For internal stakeholders, within 4 working days of a grievance arising, the employee concerned shall raise the grievance with the supervisory staff to who, the employee responsible and shall be given the opportunity to be accompanied by not more than two members of the Union Committee/Guest Workers Welfare Committee/Employee himself. If the matter still not settled within a further 5 working days, the appropriate union committee shall make representation to the estate or mill in writing and once receipt of union committee letter, the estate or mill without delay need to arrange for a meeting between executive staff to whom the employee is responsible and/or an accredited official if the estate and Union Committee members. If the matter remains unsettled, the grievance shall then be discussed between the Manager and/or his accredited officials and union committee representatives within a further period of 7 working days. Then, if the matter still remains unsettled, it shall then be dealt with under the provisions of the Industrial Relations Act, 1967 or the Employment Act.</p> <p>For external stakeholders, if the grievance received by the manager/head department/company secretary, grievance shall formally record at point of receipt and settled as soon as possible but not more than 30 days. If the matter remains unsettled, the respective manager/head department forwards the grievance to the Company Secretary. Grievance acknowledged by letter within 7 working days to stakeholders and manager/head department from company secretary. Grievance will be presented to the parent company and reviewed in the meeting with action to be taken is recorded and inform to the stakeholders. The outcome and resolution are documented, and the stakeholder informed officially by the company secretary.</p>	
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		<p>For the complaints against top management of the estate/mill or complaint from internal and external parties, such process shall be covered within Whistleblower Policy, dated 27/04/2023. The objective of the policy is to provide an avenue for employees, suppliers and other stakeholders to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing. Also observed that the policy outlines the means for handling the complaints and the means to protect the complainant upon complaining against the certain entity of the management.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -</p>	<p>The procedure as mentioned in the indicator 4.2.1 has been briefed and trained to staff and the workers. The same procedure has been briefed to the newly employed workers during induction course. Evidence of the training and briefing conducted are made available for verification during the audit.</p> <p>Observed that the policy is posted at the muster call ground, office ant worker quarters as a part of communication. Workers representative selected is responsible to communicate the procedure to the workers.</p> <p>Furthermore, the level of understanding among workers regarding the policy and procedure relating to protection of whistle-blowers and complainant is sufficient whereby the workers are able to properly demonstrate the procedure as verified during interview with sampled workers consists of Malaysian, Nepalese, Indonesian, Bangladeshi and Indian workers. Moreover, the sampled workers interviewed also confirmed that, up to their knowledge, no illiterate parties have been identified in the estate and mill. For stakeholders, it was found that they can demonstrates their understanding on the complaint mechanism in the procedure as verified during stakeholder consultation.</p>	<p>Complied</p>

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All progress, timeframe and outcome of complaint and grievance were communicated to the complainant, as verified in the stakeholder logbook form. Complaint was resolved immediately after being received. Acknowledgement from the complainant in the stakeholder logbook indicates that the complaint has been satisfactorily resolved. Information available in the stakeholder logbook form is name of complainant, passport number, detail of engagement, complainant signature, proposed action (to include target completion date & person in charge), authorized signatory/date, action taken and acknowledgement/date. Verification of sampled issues and interview with workers confirmed that all the complaints/grievances were addressed in a timely manner. It was observed that the major complaint is on housing repair at worker quarters.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Estate and mill under UIE Business Unit did recognize rights for the complainants to access independent legal and technical advice. Based on the interview with the sampled workers, there are aware they may independent legal and technical advice from third party mediator such as embassy, labour department and other government agencies. This also has been stated in the Internal Grievance Redressal Procedure and External Grievance Redressal Procedure.</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>UIE Business Unit has committed to contribute to local development in consultation with the local communities. Verification made during the audit showed that contribution to local communities' development is conducted on a case by case and that this is done following the stakeholder meeting of which the matters of the needs is brought up by the stakeholders. Following to such request, further clarification and details of the</p>	Complied

		<p>request is sought and subject to management approval. For any request that has been approved, the stakeholders are then be informed and that the contribution is executed accordingly.</p> <p>Based on records and stakeholder consultation conducted during the audit, the audit team has verified the contribution to community development made by operating unit. For example, money donation for National Day Celebration at Sekolah Kebangsaan Gelong Gajah on 04/08/2023.</p> <p>Records of contribution by the company also were documented in the Annual Report, FY 2023. Among the contribution made by the company are as follows:</p> <ul style="list-style-type: none"> - Hospital & medicine form employees, dependant and nearby communities - Education, welfare, scholarships - Bus subsidy for school children - External donations - Provision of social amenities 	
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The United Plantations Berhad legally owns all lands, as evidenced by the maintained copies of the land titles. The original copies are securely kept at the United Plantations Berhad Head Office in Jendarata Estate, Teluk Intan, Perak, Malaysia. There have been no recorded or known disputes over the ownership of the land, and no changes to the land ownership or new land acquisitions have occurred since the last assessment. There is no evidence found through open-source platform (e.g.: website, news, report, etc.) that land conflict was arise.</p> <p>The UIE Palm Oil Mill (POM) and estates, have a total land bank of 10,365.20 hectares. There are eight land titles in total, six of</p>	<p>Complied</p>

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		<p>which are leases from the Perak state government, and two are freehold lands acquired by United Plantations Berhad. The details are as follows:</p> <table border="1"> <thead> <tr> <th>Title No.</th> <th>Lot No.</th> <th>Tenure</th> <th>Expiring</th> <th>Land Use Condition</th> <th>Ownership Record</th> </tr> </thead> <tbody> <tr> <td>PN 1065884</td> <td>11445</td> <td>Leasehold</td> <td>23/12/2103</td> <td>Commercial Crop – Oil Palm</td> <td>United Plantation Berhad</td> </tr> <tr> <td>PN 352537</td> <td>Lot 10425</td> <td>Leasehold</td> <td>23/12/2103</td> <td>Commercial Crop – Oil Palm</td> <td>United Plantation Berhad</td> </tr> <tr> <td>PN 1065883</td> <td>11444</td> <td>Leasehold</td> <td>23/12/2103</td> <td>Commercial Crop – Oil Palm (0.6148 hectare allocated for UIE POM)</td> <td>United Plantation Berhad</td> </tr> <tr> <td>PN 352535</td> <td>Lot 10423</td> <td>Leasehold</td> <td>23/12/2103</td> <td>Commercial Crop – Oil Palm</td> <td>United Plantation Berhad</td> </tr> <tr> <td>PN 1065885</td> <td>12035</td> <td>Leasehold</td> <td>23/12/2103</td> <td>Commercial Crop – Oil Palm</td> <td>United Plantation Berhad</td> </tr> <tr> <td>PN 1065886</td> <td>12195</td> <td>Leasehold</td> <td>23/12/2103</td> <td>Commercial Crop – Oil Palm</td> <td>United Plantation Berhad</td> </tr> </tbody> </table>	Title No.	Lot No.	Tenure	Expiring	Land Use Condition	Ownership Record	PN 1065884	11445	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad	PN 352537	Lot 10425	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad	PN 1065883	11444	Leasehold	23/12/2103	Commercial Crop – Oil Palm (0.6148 hectare allocated for UIE POM)	United Plantation Berhad	PN 352535	Lot 10423	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad	PN 1065885	12035	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad	PN 1065886	12195	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad	
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GM 2452	Lot 1189	Freehold	-	Forest Crop – Tapioca or Gambier	United Plantation Berhad										
GM 22197	Lot 1188	Freehold	-	Orchard Crop	United Plantation Berhad										
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>During the site visit, it was confirmed that there were no breaches of the requirements stated in the land titles for both freehold lands. The areas are still being used as fruit farms and forest trees, as per the land use condition stated in the titles. Verification through the land titles has confirmed that United Plantations Berhad has the legitimate right to use the land they own.</p> <p>There is no evidence to suggest the utilization of local community land that would necessitate negotiations or agreements detailing FPIC processes. The specifics of land ownership are in accordance with Indicator 4.4.1 as previously mentioned. No land dispute as the land is belongs to United Plantation Berhad.</p> <p>Further verification during interview with sampled stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.</p> <p>All the oil palms that have been planted have entered their second cycle of planting, which began in 1989. This was further confirmed during the Annual Surveillance Assessment (2_2) with a staff member who has been with the UIE Business Unit since 1989, and a stakeholder who was born and raised in Perbadanan Gula Perak, the previous owner of the land.</p>	Not Applicable												

		Therefore, this indicator is deemed not applicable.	
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no evidence to suggest the utilization of local community land that would necessitate negotiations or agreements detailing FPIC processes. The specifics of land ownership are in accordance with Indicator 4.4.1 as previously mentioned. No land dispute as the land is belongs to United Plantation Berhad.</p> <p>Further verification during interview with sampled stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.</p> <p>All the oil palms that have been planted have entered their second cycle of planting, which began in 1989. This was further confirmed during the Annual Surveillance Assessment (2_2) with a staff member who has been with the UIE Business Unit since 1989, and a stakeholder who was born and raised in Perbadanan Gula Perak, the previous owner of the land.</p>	Not Applicable
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>There is no evidence to suggest the utilization of local community land that would necessitate negotiations or agreements detailing FPIC processes. The specifics of land ownership are in accordance with Indicator 4.4.1 as previously mentioned. No land dispute as the land is belongs to United Plantation Berhad.</p> <p>Further verification during interview with sampled stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook.</p>	Not Applicable

		All the oil palms that have been planted have entered their second cycle of planting, which began in 1989. This was further confirmed during the Annual Surveillance Assessment (2_2) with a staff member who has been with the UIE Business Unit since 1989, and a stakeholder who was born and raised in Perbadanan Gula Perak, the previous owner of the land.	
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no evidence to suggest the utilization of local community land that would necessitate negotiations or agreements detailing FPIC processes. The specifics of land ownership are in accordance with Indicator 4.4.1 as previously mentioned. No land dispute as the land is belongs to United Plantation Berhad. Further verification during interview with sampled stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues. It also has been verified on documentation review by review the complaint and grievance logbook. All the oil palms that have been planted have entered their second cycle of planting, which began in 1989. This was further confirmed during the Annual Surveillance Assessment (2_2) with a staff member who has been with the UIE Business Unit since 1989, and a stakeholder who was born and raised in Perbadanan Gula Perak, the previous owner of the land.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Appropriate landscape maps, complete with latitude and longitude coordinates, are available and maintained. These maps clearly delineate the legal boundaries and the neighbouring/surrounding areas of the POM and estates. The lands within the UIE Business Unit are legally owned by United Plantations Berhad, and no other users have been identified within this land area. The existing	Not Applicable

		estates are not subject to any customary land rights, thereby negating the need for a process of participatory mapping. Consequently, this indicator is deemed not applicable.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All relevant documents, as detailed in Indicator 4.4.1, demonstrate the legal ownership of each operating unit. There are no evidence of land conflicts or claims for legal or customary rights against the UIE Business Unit, based on a thorough review of documentation, observations made, and interviews conducted with management. All palms that have been planted have entered their second cycle of planting. Given the absence of land conflicts and the fact that all relevant information, such as assessments of impacts, proposed benefit sharing, and legal arrangements for the use of the land for oil palm cultivation, does not diminish the legal, customary, or user rights of other users without their free, prior, and informed consent, the availability of such information is deemed unnecessary. Therefore, these indicators are not applicable.	Not Applicable
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of any land conflicts or claims for legal or customary rights against the UIE Business Unit. Given the absence of such conflicts or claims, the assessment of evidence showing that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose, is deemed unnecessary for this audit. Therefore, this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no	Not Applicable

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	<p>- Minor compliance -</p>	<p>evidence of any land conflicts or claims for legal or customary rights against the UIE Business Unit.</p> <p>Given the absence of such conflicts or claims, the assessment of evidence showing that the implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties is deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>													
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>															
<p>4.5.1</p>	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit.</p> <p>Furthermore, the United Plantations Berhad legally owns all lands, as evidenced by the maintained copies of the land titles. The original copies are securely kept at the United Plantations Berhad Head Office in Jendarata Estate, Teluk Intan, Perak, Malaysia. There have been no recorded or known disputes over the ownership of the land, and no changes to the land ownership or new land acquisitions have occurred since the last assessment.</p> <p>The UIE Palm Oil Mill (POM) and estates, have a total land bank of 10,365.20 hectares. There are eight land titles in total, six of which are leases from the Perak state government, and two are freehold lands acquired by United Plantations Berhad. The details are as follows:</p> <table border="1" data-bbox="1137 1246 1912 1318"> <thead> <tr> <th>Title No.</th> <th>Lot No.</th> <th>Tenure</th> <th>Expiring</th> <th>Land Use Condition</th> <th>Ownership Record</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Title No.	Lot No.	Tenure	Expiring	Land Use Condition	Ownership Record							<p>Complied</p>
Title No.	Lot No.	Tenure	Expiring	Land Use Condition	Ownership Record										

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		PN 1065884	11445	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad
		PN 352537	Lot 10425	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad
		PN 1065883	11444	Leasehold	23/12/2103	Commercial Crop – Oil Palm (0.6148 hectare allocated for UIE POM)	United Plantation Berhad
		PN 352535	Lot 10423	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad
		PN 1065885	12035	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad
		PN 1065886	12195	Leasehold	23/12/2103	Commercial Crop – Oil Palm	United Plantation Berhad
		GM 2452	Lot 1189	Freehold	-	Forest Crop – Tapioca or Gambier	United Plantation Berhad
		GM 22197	Lot 1188	Freehold	-	Orchard Crop	United Plantation Berhad

		<p>During the site visit, it was confirmed that there were no breaches of the requirements stated in the land titles for both freehold lands. The areas are still being used as fruit farms and forest trees, as per the land use condition stated in the titles. Verification through the land titles has confirmed that United Plantations Berhad has the legitimate right to use the land they own.</p>	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities’ own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit.</p> <p>The Global Risk Assessment Services System (GRASS), a system that monitors new developments and landscape changes via satellite images, verified that there was no new development at the UIE Business Unit in recent years.</p> <p>The estate’s land statement, which was cross-checked against the previous year’s land statements and MPOB License, confirmed no additional changes to the planted area.</p> <p>Onsite interviews with sampled workers, staff, and relevant external and adjacent stakeholders confirmed no new planting activities conducted by UIE Business Unit management in recent years.</p> <p>Given the absence of such activities, the assessment of evidence showing that FPIC is obtained for all oil palm development through a comprehensive process is deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say ‘no’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit.</p>	Not Applicable

	<p>agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>Given the absence of such activities, the assessment of evidence showing that affected local peoples understand they have the right to say 'no' to operations planned on their lands at all stages - from initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples - is deemed unnecessary for this audit.</p> <p>Similarly, the assessment of whether negotiated agreements are non-coercive, entered into voluntarily, and carried out prior to new operations is also deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit.</p> <p>Given the absence of such activities, the assessment of measures to ensure local food and water security, as part of the FPIC process, participatory SEIA, and participatory land-use planning with local peoples, considering the full range of food and water provisioning options, is deemed unnecessary for this audit.</p> <p>Similarly, the assessment of transparency in the land allocation process is also deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit.</p> <p>Given the absence of such activities, the assessment of evidence showing that the affected communities and rights holders have</p>	Not Applicable

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		had the option to access information and advice independent of the project proponent, concerning the legal, economic, environmental, and social implications of the proposed operations on their lands, is deemed unnecessary for this audit. Therefore, this indicator is not applicable.	
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit. Given the absence of such activities, the assessment of evidence showing that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator is deemed unnecessary for this audit. Therefore, this indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills after 15 November 2018 at the UIE Business Unit. Given the absence of such acquisitions and new planting activities, the assessment of whether new lands were acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations is deemed unnecessary for this audit. Therefore, this indicator is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no	Not Applicable

	<p>- Critical (Major) compliance -</p>	<p>evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Business Unit. Given the absence of such acquisitions and new planting activities, the assessment of whether new lands were acquired in areas inhabited by communities in voluntary isolation is deemed unnecessary for this audit. Therefore, this indicator is not applicable.</p>	
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantation and mill, nor any new planting activities being practiced at the UIE Business Unit. However, there have been no changes compared to the previous year in the procedures adopted by the UIE Business Unit. These procedures are documented in the Grievances Redressal Procedures for Land Dispute, which is publicly available on the company’s website. The procedure is divided into three phases:</p> <ol style="list-style-type: none"> 1. Phase 1: This involves the lodging of complaints by the local communities about the dispute. Supporting documents must be submitted along with the complaint. 2. Phase 2: This phase involves the land dispute team, GIS team, and the complainant measuring and checking the location of the disputed land. If the claim is found to be valid, a negotiation process is initiated to decide whether to compensate via payment or other methods of compensation. 	<p>Complied</p>

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		<p>3. Phase 3: If a mutual agreement is not achieved during the negotiation process, the complaint is passed to court for a final decision.</p> <p>Therefore, even though there is no evidence of new acquisitions or planting activities, the company maintains a robust and transparent process to handle any potential land disputes.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>However, there have been no changes compared to the previous year in the procedures adopted by the UIE Business Unit. These procedures are documented in the SOP for Land Compensation (No. HRD-015- R00, dated 1 January 2016). The SOP outlines the standard for calculating and distributing fair compensation, providing the compensated person with a position for bargaining/negotiation.</p> <p>Therefore, even though there is no evidence of new acquisitions or planting activities, the UIE Business Unit maintains a robust and transparent process to handle any potential land disputes and ensure fair compensation.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p>	Not Applicable

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		<p>A comprehensive review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties, smallholders, or scheme small holdings.</p> <p>Given the absence of such activities, the assessment of evidence showing that equal opportunities are provided to both men and women to hold land titles for scheme small holdings is deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>Given the absence of such activities, the assessment of whether the process and outcomes of any negotiated agreements, compensation, and payments are documented, with evidence of the participation of affected parties, and made publicly available to them, is deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for</p>	Complied

		<p>plantation and mill, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>However, there have been no changes compared to the previous year in the procedures adopted by the UIE Business Unit. These procedures are documented in the Grievances Redressal Procedures for Land Dispute, which is publicly available on the company’s website. The procedure is divided into three phases:</p> <ol style="list-style-type: none"> 1. Phase 1: This involves the lodging of complaints by the local communities about the dispute. Supporting documents must be submitted along with the complaint. 2. Phase 2: This phase involves the land dispute team, GIS team, and the complainant measuring and checking the location of the disputed land. If the claim is found to be valid, a negotiation process is initiated to decide whether to compensate via payment or other methods of compensation. 3. Phase 3: If a mutual agreement is not achieved during the negotiation process, the complaint is passed to court for a final decision. <p>Therefore, even though there is no evidence of new acquisitions or planting activities, the company maintains a robust and transparent process to handle any potential land disputes.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>However, there have been no changes compared to the previous year in the procedures adopted by the UIE Business Unit. These procedures are documented in the SOP for Land Compensation (No. HRD-015- R00, dated 1 January 2016). The SOP outlines the</p>	Complied

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		<p>standard for calculating and distributing fair compensation, providing the compensated person with a position for bargaining/negotiation.</p> <p>Therefore, even though there is no evidence of new acquisitions or planting activities, the UIE Business Unit maintains a robust and transparent process to handle any potential land disputes and ensure fair compensation.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>Given the absence of such activities, the assessment of whether communities that have lost access and rights to land for plantation expansion are given opportunities, including employment and supply contracts, to benefit from plantation development, is deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit.</p> <p>The UIE Palm Oil Mill (POM) and estates have a total land bank of 10,365.20 hectares. There are eight land titles in total, six of which are leases from the Perak state government, and two are freehold lands acquired by United Plantations Berhad. Verification through</p>	Not Applicable

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		<p>the land titles has confirmed that United Plantations Berhad has the legitimate right to use the land they own. The land title, which is classified as country leased and district grant, has been verified by the auditor.</p> <p>Based on a thorough review of records and documentations, and consultations with stakeholders also reveal that there are no recorded or known disputes over the ownership of the land. There have been no changes to the land ownership or new land acquisitions since the last assessment.</p> <p>Given the absence of such activities, the assessment of evidence showing that proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute is deemed unnecessary for this audit.</p> <p>Similarly, the assessment of whether any compensation was accepted following a documented process of FPIC is also deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit. Furthermore, no land conflict is present in the area of the UIE Business Unit.</p> <p>Given the absence of such activities and conflicts, the assessment of whether acceptable conflict resolution processes as per Criteria 4.2 and 4.6 are implemented and accepted by the parties involved is deemed unnecessary for this audit.</p>	<p>Complied</p>

		Similarly, the assessment of whether the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms in the case of newly acquired plantations is also deemed unnecessary for this audit.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Based on a thorough review of documentation, observations made, and interviews conducted with management, there is no evidence of new acquisitions of lands from other parties for plantations and mills, nor any new planting activities being practiced at the UIE Business Unit. Furthermore, no land conflict is present in the area of the UIE Business Unit. Given the absence of such activities and conflicts, the assessment of whether there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) is deemed unnecessary for this audit. Therefore, this indicator is not applicable.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Upon conducting a thorough review of the available documentation, making observations, and interviewing management, there is no evidence of new land acquisitions from other parties for plantations and mills, nor any new planting activities at the UIE Business Unit. Additionally, no land conflicts exist within the UIE Business Unit area. The UIE Palm Oil Mill (POM) and its estates include a total land bank of 10,365.20 hectares. The land is divided into eight titles, six of which are leases from the Perak state government, and two are freehold lands owned by United Plantations Berhad. Verification through these land titles has confirmed United Plantations Berhad's legitimate right to utilize the land they own.	Not Applicable

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		<p>The land title, classified as country leased and district grant, has been verified by the auditor.</p> <p>A thorough review of records and documentation, coupled with stakeholder consultations, reveals no recorded or known disputes over land ownership. There have been no changes to land ownership or new land acquisitions since the last assessment.</p> <p>Given the absence of disputes, the mapping out of disputed areas in a participatory manner, involving affected parties (including neighbouring communities where applicable), is deemed unnecessary for this audit.</p> <p>Therefore, this indicator is not applicable.</p>	
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>Consequently, this indicator is deemed not applicable.</p>	Not Applicable
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders</p>	Not Applicable

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		(D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders. Consequently, this indicator is deemed not applicable.	
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module. A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders. Consequently, this indicator is deemed not applicable.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module. A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders. Consequently, this indicator is deemed not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.	Complied

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		<p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>However, a review of documentation reveals that the contracts signed with the appointed contractor/service provider are fair, legal, transparent, and have an agreed timeframe. The sampled contracts include:</p> <ul style="list-style-type: none"> (1) Sakthy Transport Sdn Bhd (CPO Transporter): Agreement Date: 01 January 2024 – 31 December 2024 (2) Sri Naresh Agency (CPO Transporter): Agreement Date: 01 January 2024 – 31 December 2024 (3) K. Kumar Excavator (Desilting Drain, Hiring Excavator): Agreement Date: 01 January 2024 – 31 December 2024 (4) PSH Enterprise (Desilting Drain, Hiring Excavator): Agreement Date: 01 January 2024 – 31 December 2024 	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which is valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module. A comprehensive review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) collectively reveal that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>However, upon reviewing the documentation, it is evident that the agreed payments for the appointed contractor/service provider are executed in a timely manner. Relevant payment records and</p>	Complied

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		<p>documentation are readily available for review. The payment records sampled include:</p> <ol style="list-style-type: none"> (1) Sakthy Transport Sdn Bhd (CPO Transporter): Invoice No. S 19356 (dated 31/05/2024), Payment Voucher No. 0324012172 (dated 11/06/2024). The payment was executed within the stipulated timeframe of 30 days post invoice submission. (2) Sri Naresh Agency (CPO Transporter): Invoice No.: 19024 (dated 31/5/2024), Payment Voucher No. 0324012169 (dated 11/06/2024). The payment was executed within the stipulated timeframe of 30 days post invoice submission. (3) K. Kumar Excavator (Desilting Drain, Hiring Excavator): Invoice dated 31/05/2024, Certificate Payment No.: 62240222 (dated 05/06/2024). The payment was executed by the 7th of the current month, based on the satisfactory completion of work. The price is stated in Schedule 1 of the contract agreement. (4) PSH Enterprise (Desilting Drain, Hiring Excavator): Invoice dated 31/05/2024, Certificate Payment No.: 62240220 (dated 05/06/2024). The payment was executed by the 7th of the current month, based on the satisfactory completion of work. The price is stated in Schedule 1 of the contract agreement. 	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Verified that there are five (5) weighbridges available at the UIE Palm Oil Mill and none (0) weighbridge available at the UIE Estates. Each of the weighbridges has been calibrated on annual basis by weighing and measuring equipment verification service provider which was appointed by the Federal Government of Malaysia through Ministry of Domestic Trade and Consumer Affairs (KPDNHEP) under the Weights and Measures Act 1972. Records of the calibration as below:</p>	Complied

		<p><u>Weighbridge 1</u></p> <ul style="list-style-type: none"> • Serial No.: 20201008107 • Registration No.: 03442 • Max. Limit: 40,000 kg • Form D. Unique No.: D 213349 • Security Stamping No.: DE17 002775 • Calibration Date: 08/05/2024 • Calibration Report No.: A 039945 <p><u>Weighbridge 2</u></p> <ul style="list-style-type: none"> • Serial No.: B 610190078 • Registration No.: 03443 • Max. Limit: 40,000 kg • Form D. Unique No.: D 213350 • Security Stamping No.: DE17 002776 • Calibration Date: 08/05/2024 • Calibration Report No.: A 039946 <p><u>Weighbridge 3</u></p> <ul style="list-style-type: none"> • Serial No.: B 610190087 • Registration No.: 03474 • Max. Limit: 80,000 kg • Form D. Unique No.: D 213651 • Security Stamping No.: DE18 014963 	
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		<ul style="list-style-type: none"> • Calibration Date: 08/05/2024 • Calibration Report No.: A 039947 <p><u>Weighbridge 4</u></p> <ul style="list-style-type: none"> • Serial No.: 01533526 KP • Registration No.: 15091 • Max. Limit: 5,000 kg • Form D. Unique No.: D 213347 • Security Stamping No.: DE14 002431 • Calibration Date: 08/05/2024 • Calibration Report No.: A 039948 <p><u>Weighbridge 5</u></p> <ul style="list-style-type: none"> • Serial No.: B 521963021 • Registration No.: 15092 • Max. Limit: 5,000 kg • Form D. Unique No.: D 213348 • Security Stamping No.: DE14 002432 • Calibration Date: 08/05/2024 • Calibration Report No.: A 039949 	
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders</p>	Not Applicable

	<p>- Minor compliance -</p>	<p>(D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders. Consequently, this indicator is deemed not applicable.</p>	
<p>5.1.9</p>	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module. A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders. However, in the event of any grievance from an external party, the management of UIE POM UoC has adopted a grievance procedure that has been established by the management of UPB. This procedure ensures that any grievance is managed judiciously and addressed in a timely manner. This procedure, known as the <i>Prosedur Redressal Rungutan – Pihak Berkepentingan Luar</i> “Grievance Redressal Procedure - External Stakeholders”, which is contained in the <i>Buku Panduan Pekerja & Pihak Berkepentingan</i> “Employee & Stakeholder Handbook” (revised on 04/30/2021). From the minutes of the external stakeholders meeting that were reviewed during the audit, it was found that this procedure was also part of the topics that had been presented by the management to their external stakeholders during the Stakeholders Dialogue Session held on 23/05/2024.</p>	<p>Complied</p>
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			

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5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>Consequently, this indicator is deemed not applicable.</p>	Not Applicable
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>Consequently, this indicator is deemed not applicable.</p>	Not Applicable
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p>	Not Applicable

		Consequently, this indicator is deemed not applicable.	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>Consequently, this indicator is deemed not applicable.</p>	Not Applicable
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>As per the RSPO Certificate No. RSPO 693198, which remains valid until 28/09/2027, it has been confirmed that the UIE POM operates on the IP Module.</p> <p>A thorough review of the Mill’s Production Figure, an interview with the Weighbridge Operator, and a sample of FFB Delivery Orders (D/O) have collectively revealed that the UIE POM exclusively receives Fresh Fruit Bunches (FFB) supplies from its own RSPO-certified estates, known as UIE Estates. There is no procurement of FFB from external parties or smallholders.</p> <p>Consequently, this indicator is deemed not applicable.</p>	Not Applicable
Principle 6: Respect workers’ rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>United Plantation Berhad established Human Right Policy, dated 09/03/2020 where stated the company’s commitment on non-discrimination and equal opportunity. The policy is publicly available in the company’s website</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>https://unitedplantations.com/policies/#Sustainability-Policies. In the policy stated the objectives as follows:</p> <ul style="list-style-type: none"> - Ensure all personnel are treated fairly and protected from any form of discrimination that would institute a violation of their human rights. - 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>Further verification indicates that the above policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by several stakeholders consists of neighbouring, contractors, government bodies and local communities. The meeting was conducted combining all stakeholders in the UIE Business Unit.</p> <p>Besides the above, the interviewees, including managerial level, workers, contractors and their workers, local community have given feedback they understood that the gist of the policies. Based on records of employment and interviews conducted on-site with sampled internal and external stakeholders, it has been confirmed that workers and groups, including local communities, women, and migrant workers, have not been subjected to discrimination.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p>	<p>Evidence is available that there has been no form of discrimination against any employee, or group of employees. Review of payslips and employment contracts confirm that all workers irrespective of nationalities, gender, religion, etc., are accorded the same terms</p>	Complied

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	- Critical (Major) compliance -	<p>of employment, pay, benefits and living standards. Company provides all the related mandated applicable social benefits to all its local and foreign workers, for example Employee Provident Fund (EPF), Social Security Organization (Socso), Employment Insurance System (EIS), Annual Leave, Public Holidays & Statutory Holidays, Medical Leave and Maternity Leave.</p> <p>Based on interview with the sampled workers from different gender and nationalities at estate and mill under UIE Business Unit, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers. The company's bear all the recruitment fees which includes food, accommodation, transportation and repatriation.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Based on documentation review and interviews conducted with management and sampled workers at UIE Business Unit, recruitment selection, hiring, access to training and promotion are based on workers' skills, capabilities, qualities, and medical fitness necessary for the job.</p> <p>There is evidence that estate and mill under UIE Business Unit has demonstrate that recruitment base on capabilities and qualities which has been verified during interview by the operating units and for foreign workers at the origin country. Training also was provided to the workers based on their job scope as verified in the training records and programme. This also confirmed through the interview conducted with sampled workers during the audit.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Based on interview with Estate Hospital Assistant and sampled of female workers, it was confirmed that there is no requirement for pregnancy testing to be conducted in estate and mill under UIE</p>	Complied

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	<p>- Minor compliance -</p>	<p>Business Unit. However, pregnancy test only been conducted for newly recruited female workers (non-production and production) as part of pre-recruitment process where it will be done by Estate Hospital Assistant and VMO. The purpose of the test is to ensure that position offered is suitable for pregnant women. Another test required for pregnancy test is for those working in chemically expose environment and part of biological monitoring under medical surveillance programme. In summary, pregnancy test is not conducted as a discriminatory measure.</p>	
<p>6.1.5</p>	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -</p>	<p>United Plantation Berhad has established the Gender Policy, dated 24/04/2025 and signed by Chief Executive Director. The policy emphasizes the commitment 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. Among objectives of the policy are encourage effective participation of women in decision making by their representation as members of various committees, established a gender committee and to protect reproductive rights and motherhood responsibilities of women.</p> <p>In line with the above policy, estate and mill under UIE Business Unit have their own gender committee. The objectives of this committee are to raise awareness, identify and address issue of concern, as well as opportunities and improvement for women. It also serves as a medium for female employees discuss any issues including but not limited to sexual harassment, physical violence, gender discrimination, welfare and workplace related issues. Appointment letter for gender committee members for the period from 01/01/2023 to 31/12/2024 and the gender committee organisation chart were verified during the audit. The committee comprised female employees from various job description. The committees had their regular meeting once in every four months.</p>	<p>Complied</p>

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		<p>Latest meeting was conducted on 22/04/2024. Minutes of meeting were made available for verification. The meeting agenda are as follows:</p> <ul style="list-style-type: none"> • Briefing on Gender Policy • Briefing on grievance procedure on sexual harassment and domestic/workplace violence • Discussion on women specific topics • New mother assessment • Briefing on the rights and needs of new mother (pre- and post-delivery) • Summary of sexual harassment and domestic/workplace violence • Gathering feedback and input • Other (domestic/workplace related issues) <p>There has been no issue raised by the female workers as verified from the feedback forms and minutes of meeting with regards to discrimination, unfair treatment and opportunity disparity. Based on interview with the gender committee representatives, it was confirmed that there has been no cases of sexual harassment or violence reported. The representatives also expressed that they feel safe working in the UIE Business Unit, as all employees respects each other.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>The wage structure in the UIE Business Units follows the Malayan Agricultural Procedures Association (MAPA) rates which also follow the Minimum Wages Order 2022. Each of the job has their own work scope which also included in the contract agreement of the workers. The salary structure is comprised of the total daily rates (based on performance), overtime, and other benefits.</p>	Complied

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		<p>For the harvester, the wage structure is based on the MAPA/NUPW rates of pay for harvesting and other criteria which include the height of the oil palm trees. The workers were paid accordingly. Based on the sampled payslips for workers (as per indicator 6.2.3), which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 and MAPA/NUPW collective agreements without any form of discrimination. This was also evident through interview with a group of workers sampled. Sample of workers for each visited operating units listed as per below worker's ID:</p> <p><u>UIE POM</u></p> <table border="1"> <tr><td>411826</td><td>120904</td></tr> <tr><td>401740</td><td>416670</td></tr> <tr><td>416838</td><td>414799</td></tr> <tr><td>415523</td><td>416759</td></tr> <tr><td>416845</td><td>413381</td></tr> <tr><td>416027</td><td>414483</td></tr> <tr><td>414782</td><td>204710</td></tr> <tr><td>416278</td><td>308953</td></tr> </table> <p><u>UIE Estate</u></p> <table border="1"> <tr><td>810027</td><td>208589</td></tr> <tr><td>407940</td><td>810265</td></tr> <tr><td>208957</td><td>121800</td></tr> <tr><td>810127</td><td>312169</td></tr> <tr><td>810044</td><td>119685</td></tr> <tr><td>118820</td><td>810050</td></tr> <tr><td>211507</td><td>110684</td></tr> </table>	411826	120904	401740	416670	416838	414799	415523	416759	416845	413381	416027	414483	414782	204710	416278	308953	810027	208589	407940	810265	208957	121800	810127	312169	810044	119685	118820	810050	211507	110684	
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Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).				
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantation Berhad has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019] and the collective agreement is valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court. Employment contract was established based on the collective agreement and available in all languages of which the workers are from.</p> <p>Samples of employment contract for 36 workers from all operations type were reviewed. These work contracts were made referenced to the applicable Malaysian Law. Pay and conditions stated in the contract agreement was refer to the MAPA/NUPW collective agreement which is follow Minimum Wages Order 2022. Based on the interview with sampled workers, the agreement was explained to them from the sourcing country and by the management upon arrival.</p> <p>The employment contract includes terms and conditions regarding pay and benefits as well as applicable labour laws such as Employment Act, Employee Provident Fund and SOCSO Act.</p> <p>Payslip are provided to all workers and During interview with sampled workers, shows that they are able to demonstrate their understanding on the payslip. Mill and Estate workers' salaries are paid based on Minimum Wages Order 2022 as stipulated in employment contract for the foreign and local worker at mill and estate. In addition, interviewed with sampled workers indicated that they are aware on the terms and conditions which have been clearly specified in the employment contract.</p>		Complied

		The contracts acknowledged by the workers as part of confirmation that the workers understood the content of agreement. For those workers who unable to understanding the content of contracts, respective operating unit has selected the interpreter as a middle person to explain to worker for their better understanding.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	Based on sampled employment contracts the contracts were signed in dual language which is English and their home country language such as Bahasa Indonesia, Hindi, and Bangladeshi. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Collective agreement, Employment Act and Minimum Wage Order 2022.	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantation Berhad has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019] and the collective agreement is valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court.</p> <p>Estate and mill under UIE Business Unit has established a contact agreement and offer letter for foreign and local workers, respectively. The contract agreement is available in languages depends on which country they are from. The contract agreement found signed by both parties (management and workers). Document review found, the employment contract has included a terms and condition of employment as example below:</p> <ul style="list-style-type: none"> ● Wages ● Working Hours 	Complied

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		<ul style="list-style-type: none"> • Sick Leave • Annual Leave • Termination Service • Rest Day • Public Holiday <p>According to the interviewed workers, their working days are from Monday to Saturday, with Sunday is the rest day. The unused annual leaves are paid during the December salary. The calculation of the paid annual leaves is based on their monthly salary which fluctuate depending on their performance and the rate is calculated as Ordinary Rate Pay as specified in the Employment Act.</p> <p>Samples payslip for workers from various operations such as mill operators, harvester, field workers and general workers were verified. Overtime was found to be appropriate, and deduction was fairly made as per the agreement and approval from the Labour Department. Sample of workers for each operating units listed as per below worker's ID:</p> <p><u>UIE POM</u></p> <table border="1" data-bbox="1137 1054 1906 1342"> <tr><td>411826</td><td>120904</td></tr> <tr><td>401740</td><td>416670</td></tr> <tr><td>416838</td><td>414799</td></tr> <tr><td>415523</td><td>416759</td></tr> <tr><td>416845</td><td>413381</td></tr> <tr><td>416027</td><td>414483</td></tr> <tr><td>414782</td><td>204710</td></tr> <tr><td>416278</td><td>308953</td></tr> </table>	411826	120904	401740	416670	416838	414799	415523	416759	416845	413381	416027	414483	414782	204710	416278	308953	
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6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Workers are accommodated at the housing complex quarters of the UIE Complex without any charges. Estate and mill under UIE Business Unit has provided adequate housing where foreign workers have been allocated in workers’ hostel with 4 rooms and 2 toilets with 8 persons per house. While for local workers, they have been allocated at semi-D workers house per family. Housing provided to the workers was certified fit to be use as living quarters as evident in certificate of fitness issued by Labour Department.</p> <ul style="list-style-type: none"> - Certificate of Fitness No.: PCF 10804/2019/0001 for 8 unit, dated 04/11/2019. - Certificate of Fitness No.: PCF 10804/2019/0002 for 8 unit, dated 04/11/2019. - Certificate of Fitness No.: PCF 1080420110001 (Phase 3) for 4 unit, dated 24/04/2013. - Certificate of Fitness No.: PCF 1080420110001 (Phase 2) for 8 unit, dated 24/04/2013. - Certificate of Fitness No.: PCF 1080420110002 for 8 unit, dated 21/02/2013. 	Complied																		

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		<ul style="list-style-type: none"> - Certificate of Fitness No.: PCF 1080420110001 for 8 unit, dated 01/12/2011. - Certificate of Fitness No.: PCF 10804/2021/0007 for 4 unit, dated 15/05/2021. - Certificate of Fitness No.: PCF 10804/2023/0002 for 4 unit, dated 13/07/2023. <p>Free water supply, subsidised electric supply and free medical support were also given to all workers. Water supplies supplied through Lembaga Air Perak and electricity through Tenaga Nasional Berhad for free. Estate clinic has been established and services provided for free which accommodate with medical equipment and medicine.</p> <p>For education, the nearest school located at Pantai Remis which are Sekolah Kebangsaan 40 Rantai, SJK (C) Sungai Batu, SJK (T) Ladang Sogamana and also located in Ayer Tawar and the management provided transport for school kids at zero cost. Surau and temple has been established at UIE complex land and cost of construction supported by the management. Sport facilities such football field, takraw, volleyball is also available at the housing area.</p> <p>Housing inspection was conducted weekly by the Estate Hospital Assistant and 2 times per month by appointed VMO using the Weekly Inspection of Workers & Staff Quarters, Shophouse & Office/Mill Complex Form. Sighted the form were categorized into:</p> <ul style="list-style-type: none"> ● No illegal extension ● Drainage system ● General sanitation ● Toilet ● Recyclable items 	
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		<ul style="list-style-type: none"> Cleanliness <p>During site visit to the worker quarters compound, it was observed that the condition of housing and surrounding area accurately reflects the housing inspection report. Observed the drain are free-flowing and the domestic waste is properly managed. All domestic waste will be collected daily and dumped into the landfill. There is no significant damage to the workers housing and the house are found to be habitable, equipped with basic amenities such as personal locker, built-in bed, mattress, gas stoves and ceiling fan.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in most of the housing complex. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with regards to the price of supplies. Based on interview, the basic supplies were affordable.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p>	<p>Decent living wages have been calculated by referring to RSPO Guidance on Calculating Prevailing Wages with Collaboration with Monash University, Sime Darby Berhad & IOI Berhad.</p> <p>The assessment also referred to the Benchmark Living Wage (Based on Monash University's Study) and Benchmark Living Wage in Source Country (Bangladesh, India and Indonesia).</p> <p>As a summary, prevailing wages for local workers were within RM2,200 to RM2,800 while for guest workers were within RM2,300 to RM3,300 comparing to minimum wages for Malaysia is RM1,500.</p>	Complied

	<p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of</p>	<p>All core activities such as milling activities, harvesting, chemical spraying and fertilizer application were performed by the permanent employee.</p>	<p>Complied</p>

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	<p>certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>Estate and mill under UIE Business Unit has appointed a contractor for hiring excavator, desilting drain and transporting of CPO. Through documentation review, estates and mill has established a contract agreement between the contractors and describe the term and condition of the job awarded. Verification on the contract agreement found, the contract agreement is signed by both parties. There are no casual or temporary workers has been recruited by estate and mill as verified in the master list of workers.</p>	
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantation Berhad has established Human Rights Policy, dated 09/03/2020 and signed by Chief Executive Director. The policy stated that the management respect the right of personnel to form, join and participate in registered trade unions and to bargains collectively. The policy is publicly available in the company's website https://unitedplantations.com/policies/#Sustainability-Policies.</p> <p>Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest minutes of meeting between management and workers representatives on 14/05/2024. Further verification indicates that the above policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by</p>	<p>Complied</p>

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		<p>several stakeholders consists of neighbouring, contractors, government bodies and local communities.</p> <p>Based on interview with the sampled workers, indicates that they are aware on the policy and the rights to join union.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, estate and mill under UIE Business Unit has conducted a meeting between workers representatives and management as follows:</p> <ul style="list-style-type: none"> - 14/05/2024 - 15/02/2024 - 13/12/2023 <p>Sighted minutes of meeting was documented in Bahasa Malaysia and the minutes meeting has been classified as publicly available and can be requested when needed. The worker’s representative from each nationality will help to translate the meeting minute especially for the new joiner. The meeting is a platform to discuss any issues from the workers. Interviewed with the workers representatives confirmed that the issues raised during the meeting were resolved. Sampled workers interview also informed that workers representatives are freely elected where there is no interference from management, and they are also involved in voting to appoint representatives.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interview with the workers representatives and the workers confirmed that the election of the representatives were freely done by the workers without any influence or interference from the management.</p>	Complied
<p>Criterion 6.4: Children are not employed or exploited.</p>			

<p>6.4.1</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>United Plantation Berhad has established Human Rights Policy, dated 09/03/2020 and signed by Chief Executive Director. The policy stated that the management will not tolerate the use of child or forced labour, slavery or human trafficking in any plantation and facilities. The definition of child labour as United Nations Convention on the of the child which is less than 18 years old. The policy is publicly available in the company's website https://unitedplantations.com/policies/#Sustainability-Policies.</p> <p>Further verification indicates that the above policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by several stakeholders consists of neighbouring, contractors, government bodies and local communities.</p> <p>Besides that, there is a clause in the contract agreement with contractor where mentioned the contractor shall adhere with the Human Rights Policy.</p>	<p>Complied</p>
<p>6.4.2</p>	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children working in estate and mill under UIE Business Unit. Further confirmation was made through site visit at the workplace area and interviews with the workers onsite. Documented age screening verification procedure are incorporated in Standard Operating Procedure – Recruitment of Guest Workers, dated 31/03/2023 and Standard Operating Procedure – Recruitment of Local Workers.</p>	<p>Complied</p>

6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by estate and mill under UIE Business Unit as their minimum age was 18 years old. This has verified with the list of employees and through interviewed with sampled stakeholders and workers.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The Human Rights Policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by several stakeholders consists of neighbouring, contractors, government bodies and local communities.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantation Berhad has established Human Rights Policy, dated 09/03/2020 and signed by Chief Executive Director. The policy stated that the management committed to the protection and advancement of human rights including prohibiting violence and sexual harassment among all employees. The policy is publicly available in the company's website https://unitedplantations.com/policies/#Sustainability-Policies.</p> <p>Further verification indicates that the above policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by several</p>	Complied

		<p>stakeholders consists of neighbouring, contractors, government bodies and local communities.</p> <p>Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster once in a while. Furthermore, the female workers are aware of the procedure if such incident occurs whereby, they can reports using the grievance channel such as whistleblowing, or direct report to the management.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantation Berhad has established the Gender Policy, dated 24/04/2025 and signed by Chief Executive Director. The policy emphasizes the commitment 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. Among objectives of the policy are encourage effective participation of women in decision making by their representation as members of various committees, established a gender committee and to protect reproductive rights and motherhood responsibilities of women.</p> <p>the above policy has been communicated to the workers and conducted on yearly basis for new and existing workers as evident in the training record. Briefing of the policy was conducted on 06/01/2024 and 19/01/2024 for UIE POM and UIE Estate, respectively. While for relevant stakeholders, communication of the policy was conducted during stakeholder meeting on 23/05/2024 and attended by several stakeholders consists of neighbouring, contractors, government bodies and local communities.</p>	Complied

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		Further verification through interview with the sampled stakeholders and workers, indicates their understanding on the policy that has been established.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	Verification through interviews with sampled workers (both male and female) and review on the maternity records shows that there is no new mother in estate and mill under UJE Business Unit. The minutes of the gender committee meeting indicate that the most recent new mother assessment was conducted in 2022. No new mother assessment for 2023 and to 2024 as there is no new mother within that period in UJE POM certification unit.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	United Plantations Berhad has established procedure for complaint and grievance which is respects anonymity and protects complainants where requested. Procedure for complaint and grievance has been established and documented in Internal Grievance Redressal Procedure and External Grievance Redressal Procedure. The procedure specified that the step to lodge complaints/grievance. For internal stakeholders, within 4 working days of a grievance arising, the employee concerned shall raise the grievance with the supervisory staff to who, the employee responsible and shall be given the opportunity to be accompanied by not more than two members of the Union Committee/Guest Workers Welfare Committee/Employee himself. If the matter still not settled within a further 5 working days, the appropriate union committee shall make representation to the estate or mill in writing and once receipt of union committee letter, the estate or mill without delay need to arrange for a meeting between executive staff to whom the employee is responsible and/or an accredited official if the estate and Union Committee members. If the matter remains	Complied

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		<p>unsettled, the grievance shall then be discussed between the Manager and/or his accredited officials and union committee representatives within a further period of 7 working days. Then, if the matter still remains unsettled, it shall then be dealt with under the provisions of the Industrial Relations Act, 1967 or the Employment Act.</p> <p>For external stakeholders, if the grievance received by the manager/head department/company secretary, grievance shall formally record at point of receipt and settled as soon as possible but not more than 30 days. If the matter remains unsettled, the respective manager/head department forwards the grievance to the Company Secretary. Grievance acknowledged by letter within 7 working days to stakeholders and manager/head department from company secretary. Grievance will be presented to the parent company and reviewed in the meeting with action to be taken is recorded and inform to the stakeholders. The outcome and resolution are documented, and the stakeholder informed officially by the company secretary.</p> <p>For the complaints against top management of the estate/mill or complaint from internal and external parties, such process shall be covered within Whistleblower Policy, dated 27/04/2023. The objective of the policy is to provide an avenue for employees, suppliers and other stakeholders to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing. Also observed that the policy outlines the means for handling the complaints and the means to protect the complainant upon complaining against the certain entity of the management.</p> <p>Estate and mill under UIE Business Unit has established gender committee with objective to improve awareness, identify opportunity and improvement and issue of the workers specifically</p>	
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		<p>on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. Verification made during interview with sampled female workers indicate that there is no harassment cases occurred within UIE Business Unit.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>The company’s commitment statement to respect human rights by complying with labour rights standard and legislation in ensuring that no forced and trafficked labour is documented in the Guest Workers Policy, dated 31/12/2021. In the policy, includes the following key point:</p> <ul style="list-style-type: none"> - Accredited Recruitment Agents are carefully selected to ensure that all guest workers are recruited transparently and without deception. No Guest worker shall pay recruitment cost to come and work for UP. - Further verification on the recruitment process is conducted upon arrival of the guest workers to ensure no imposition or collection of any non-mandated/illegal fees, commissions and /or levies from them by any parties. - All Guest Workers sign employment contracts in their native languages at their source country. Contract substitution is strictly prohibited. - All Guest Workers is given the option to voluntarily keep their passports in the allocated individual passport lockers with keys in a dedicated secured building to which they have free access at all times. - No withholding of wages nor penalty for Guest Workers who choose to leave the Company, other than as stipulated in the employment contract. 	<p>Complied</p>

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		<ul style="list-style-type: none"> - All works are carried out voluntarily including overtime and Work on Day of Rest (WDR) as per the rate stipulated in the Malaysian Employment Act. <p>Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:</p> <ol style="list-style-type: none"> a. Retention of identity documents or passports: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the labour quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management. b. Charging of recruitment fee: As specified in the Standard Operating Procedure – Recruitment of Guest Workers, all recruitment fees are borne by the company. The HRSS department conducts verification processes during pre-arrival and post-arrival of workers to ensure no recruitment fees are charged to them. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees. c. Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Employment contract was signed at their origin country. Explanation of terms and condition in the contracts was 	
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		<p>conducted in their origin country. Interview with the sampled workers confirmed that they have entered into employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</p> <ul style="list-style-type: none"> d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for estate and mill under UIE Business Unit. e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the company. Verification of the repatriation records and interview with the sampled workers, shows that the workers are given freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 12 years, have taken long leaves 2 or 3 times during their services. f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement. <p>Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment</p>	
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		that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers.	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The specific labour policy and procedures for migrant workers are documented in Guest Workers Policy, Standard Operating Procedures - Recruitment of Guest Workers and Guidelines and Procedures for Responsible Recruitment of Foreign Workers. The policy states that provide fair and equal employment opportunities for all employees, regardless of race, nationalities, religion, or gender. The guidelines states among other things, are selection of recruitment agencies are based on many factors including but not limited to reputation, shall be legally registered in its home country and long-standing reputation, cost, and reliability. The guideline also specifically mentioned on arrival of foreign workers, orientation and induction training, health screening, provision of basic terms, passport handling etc up to post employment. Other than that, decisions related to hiring of new workers shall be made based on business needs, job requirements and individual qualifications and without regard to race, religion or gender, ensures equal opportunity, non-discriminatory practices, no contract substitution etc.</p> <p>As reflected earlier in indicator 6.6.1, it was found that the implementation was according to the policy and procedure established.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>The management of UPB has appointed a Safety and Health Officer who holds overall responsibility for safety and health issues across the entire UIE POM UoC. In accordance with the Occupational Safety and Health (Amendment) Act 2022, which requires the appointment of an Occupational Safety and Health</p>	OFI

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	<p>- Critical (Major) compliance -</p>	<p>Coordinator, there are three such coordinators at UIE Estates and one at UIE POM. Their DOSH Registration Numbers are as follows:</p> <table border="1" data-bbox="1137 435 1895 671"> <thead> <tr> <th>Operating Unit</th> <th>DOSH Registration No.</th> </tr> </thead> <tbody> <tr> <td>UIE Estates</td> <td>PK/23/OSHC/02/01510 PK/23/OSHC/02/01515 PK/23/OSHC/02/01527</td> </tr> <tr> <td>UIE POM</td> <td>PK/23/OSHC/02/01520</td> </tr> </tbody> </table> <p>The Resident Engineer of UIE POM and the Deputy Group Manager of UIE Estates have been appointed as the overall persons responsible for safety and health for the respective operating unit, and also serve as chairpersons for the Safety & Health Committee. Their appointments were made official on 01/04/2021 and 01/01/2023 respectively.</p> <p>The Safety & Health Committee at the UIE Palm Oil Mill consists of 1 Chairman, 1 Secretary, 10 Employer Representatives, and 10 Employee Representatives. The appointment letters for all members were issued on 14/02/2024 by the Resident Engineer. Similarly, the Safety & Health Committee at UIE Estates consists of 1 Chairman, 1 Secretary, 26 Employer Representatives, and 26 Employee Representatives, with appointment letters issued on 01/01/2023 by the Deputy Group Manager.</p> <p>For each operating unit of the UoC, OSH meetings are conducted in accordance with the Occupational Safety and Health (Safety and Health Committee) Regulations 1996. Prior to these meetings, the agenda and announcement are disseminated to all employees, particularly the Safety & Health Committee Members, via a notice board display, briefing during the morning muster, and by hand the meeting notice to each Safety & Health Committee Members.</p>	Operating Unit	DOSH Registration No.	UIE Estates	PK/23/OSHC/02/01510 PK/23/OSHC/02/01515 PK/23/OSHC/02/01527	UIE POM	PK/23/OSHC/02/01520	
Operating Unit	DOSH Registration No.								
UIE Estates	PK/23/OSHC/02/01510 PK/23/OSHC/02/01515 PK/23/OSHC/02/01527								
UIE POM	PK/23/OSHC/02/01520								

		<p>The latest meetings for UIE POM were conducted on 26/06/2024, 11/03/2024, 15/12/2023, and 02/10/2023. The discussions during these meetings covered a range of topics including:</p> <ul style="list-style-type: none"> (1) The confirmation of the minutes of the last meeting (2) Current Issues (3) OSHA Policy (4) Review of Various Health Operations (HIRARC) (5) Review of Chemical Risk Assessment to the users (CHRA) (6) Chemical Exposure Monitoring (7) Stack Monitoring (8) Ambient Air Monitoring (9) Safety Performance (10) Personal Protective Equipment (PPE) (11) Training on OSHA (12) Hazard Identification Risk Assessment & Risk Control (HIRARC) (13) Other safety and health issues. <p>For UIE Estates, the latest meetings were conducted on 26/06/2024, 27/03/2024, 13/12/2023, and 20/09/2023. The discussions during these meetings covered topics such as:</p> <ul style="list-style-type: none"> (1) Review of OSH Policy (2) Review of HIRARC & SOP (3) Review of CHRA (4) Annual Medical Surveillance (5) Safety Performance 	
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		<ul style="list-style-type: none"> (6) Personal Protective Equipment (PPE) (7) OSH Training (8) Safety Barrier (9) Emergency Response Plans (10) Worksite Visits (11) Safe Working Environment (12) OSH issues & other new issues. <p>Once the minutes of these meetings are approved by the respective Head of the Operating Unit, copies of the minutes are distributed to each member of the Safety & Health Committee and displayed on the notice board.</p> <p>In conclusion, the appointment of responsible persons for workers' safety and health, and regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly, are effectively implemented.</p> <p>At UIE Palm Oil Mill, the mechanism to ensure the frequency of OSH meeting conducted as per Occupational Safety and Health (Safety and Health Committee) Regulations 1996 could be further enhance.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and</p>	<p>Procedures for accidents and emergencies have been established, including the formation of an Emergency Response Plan (ERP) Team. The ERP addresses all identified incidents. These procedures are available in both English and Bahasa Malaysia (the national languages). Additionally, these procedures have been summarized in flowchart form and are displayed for all employees</p>	Complied

	<p>first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>in the estates and mill. The ERP covers emergencies related to fire, chemical spillage, floods, and workplace accidents.</p> <p>Emergency Response Plan Flow Charts are available to address emergencies such as accidents and dangerous occurrences, physical injuries, chemical spillages, vehicle accidents, fire outbreaks, major spillages, chemical poisoning, and the prevention of COVID-19 infection in UIE POM UoC.</p> <p>Emergency Response Plans, which include emergency contact numbers, emergency evacuation procedures, first aid locations, fire extinguisher locations, and emergency response plans for fire, chemical spillage, chemical contamination, floods, and accidents, are displayed at strategic locations around the mill, estate office, and stores. Competent personnel have been appointed and trained to be part of the Emergency Response Team.</p> <p>The operating units continuously provide training to workers to ensure awareness of the ERP. The training records reviewed are as follows:</p> <ul style="list-style-type: none"> • UIE Palm Oil Mill: Fire Drill & Emergency Response on 08/01/2024 • UIE Estates: Fire Drill & Emergency Response Plan (ERP) on 22/05/2024. <p>The management has established a First Aid Kit Monitoring Checklist, which mandates that each first aid kit should include 18 items. These items are medicated oil, yellow lotion, Dettol, Eye Glo, W.O.W bandage 2", crepe bandage 5cm, eye pad, triangular bandage, handy plaster, micropore tape 1/2", sterile cotton pack, sterile gauze pack, gloves, blunt tip scissor, wooden split, safety pins, flanel, and antiseptic cream.</p>	
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		<p>The most recent First Aid Training was conducted on 18/03/2024 by the Hospital Assistant (HA) for all Persons in Charge (PIC) of the First Aid Kit. The latest Sustainability Internal Audit was carried out on 21/02/2024 at UIE POM and 20/02/2024 at UIE Estates by the Human Resource, Sustainability & Safety (HRSS) Department. The audit reports highlight that the inspection of items in the first aid kit was incorporated as part of the audit.</p> <p>The First Aid Kit Monitoring Checklist was utilized to inspect the items in the first aid kit on a monthly basis. The most recent inspections were conducted on the following dates: 12/06/2024, 12/05/2024, 12/04/2024, 12/03/2024, 10/02/2024, and 10/01/2024.</p> <p>During the site visit, it was verified that the first aid box was available at various locations including the boiler station, mill workshop, mill loading ramp, nursery area, and during FFB harvesting activity, and loose fruits collection activity. It was also confirmed that the items in the first aid kit were in alignment with the First Aid Kit Monitoring Checklist and were still valid during a site visit at the Engine Room in UIE POM and harvesting activity at UIE Estates.</p> <p>An interview with the Hospital Assistant (HA) confirmed that he is responsible for inspecting the items in the First Aid Kit in terms of their condition, sufficiency, and validity. He also disclosed that each first aid kit will be submitted to him on a monthly basis for inspection, which will be recorded using the latest First Aid Kit Monitoring Checklist.</p> <p>Interviews with the selected PIC for the first aid kit confirmed that the training was conducted by the HA, with the most recent session conducted on 18/03/2024. From the interviews, it was verified that they understand how to utilize the first aid kit and are familiar with the function of each item in the first aid kit. They also</p>	
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		<p>mentioned that the HA reminds them to submit the first aid kit to him on a monthly basis for inspection and monitoring purposes.</p> <p>During site visit at the POM and audited estates verified that adequate fire extinguishers and hose reels found to be located at strategic locations, operational and maintained in good conditions. In addition, the management also prepared emergency showers and emergency eye wash at strategic locations (e.g., chemical store, laboratory, premix area, fertiliser store, etc.), which also operational and maintained in good conditions. Location map of first aid kits, fire extinguishers, emergency showers and emergency eyewash are available and displayed at strategic area surrounding office and stores.</p> <p>Each operating unit maintains records of all accidents. In the event of a workplace accident, an investigation is conducted. Furthermore, these accident records are reviewed during quarterly Occupational Safety and Health (OSH) meetings.</p> <p>For UIE POM, there has been one accident in 2024 so far. This incident involved a locomotive driver on 07/05/2024. An investigation and emergency meeting were conducted on the same day. The JKKP 6 report was filed on 10/05/2024, followed by a visit from JKKP Negeri Perak on 21/05/2024.</p> <p>For UIE Estates, there were three accidents in 2023:</p> <ul style="list-style-type: none"> • An incident involving a harvester occurred on 19/03/2023. An emergency meeting was conducted on 31/03/2023, and the JKKP 6 report was filed on 27/03/2023. 	
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		<ul style="list-style-type: none"> • An incident involving a pruner occurred on 07/06/2023. An emergency meeting was conducted on 10/06/2023, and the JKKP 6 report was filed on 12/06/2023. • Another incident involving a harvester occurred on 19/08/2023. An emergency meeting was conducted on 23/08/2023, and the JKKP 6 report was filed on 25/08/2023. <p>In 2024, there has been one accident involving a harvester on 04/05/2024. An emergency meeting was conducted on 05/05/2024, and the JKKP 6 report was filed on 09/05/2024.</p> <p>All accident cases have been reported to SOCSO for compensation purposes. The report and evidence of compensation payment to the affected workers were sighted.</p> <p>Overall, the practice of maintaining records of all accidents and conducting periodic reviews at quarterly intervals is effectively implemented by the respective operating units of the UIE POM UoC.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>A comprehensive awareness and training program, focusing on the use of Personal Protective Equipment (PPE) and Personal Hearing Protector (PHP), has been conducted. This program ensured that all participating workers received adequate training in safe working practices. The primary objective was to equip all workers with a thorough understanding of Safety Data Sheets (SDS), safe working procedures, and the correct application of PPE and PHP.</p> <p>Appropriate PPE and PHP have been distributed to the workers, guided by established SOPs, HIRARC, information derived from the SDS, and recommendations from the CHRA assessor and the NRA assessor.</p>	Complied

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		<p>During the site visit, it was evident that the PPE and PHP were effectively implemented across various areas. These areas included the sterilizer station, press station, loading ramp, oil room, boiler, and during harvesting activities and loose fruits collection activities.</p> <p>Interviews with workers confirmed that each piece of PPE and PHP they received was provided free of charge. In the event of damage or when replacement is due, the worker simply returns the used PPE or PHP to the management, who then issues new PPE or PHP to the worker. This process of PPE and PHP issuance is thoroughly recorded by the management. The records of PPE issuance to the workers were verified during the audit.</p> <p>To prevent any PPE designated for chemical handlers from being taken home, the management has allocated a specific area for washing and storing PPE.</p> <p>Used PPE and PHP are collected by the management for proper disposal. Used PPE is classified as scheduled waste, registered under the code SW410. The most recent disposal occurred on 02/04/2024, as per Consignment Note No. 2024040210HDFYG3.</p> <p>The estate management has thoughtfully provided sufficient shower facilities for chemical handlers, especially for those applying pesticides. These facilities are particularly beneficial for those returning from activities that involve the application of chemicals, allowing them to thoroughly sanitise themselves before heading home from work. During a site visit, it was confirmed that all shower facilities were in good working condition.</p>	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.	The estate management ensures that all workers receive comprehensive medical care, the cost of which is fully covered by the management of the operating units. Each operating unit is	Complied

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	<p>- Minor compliance -</p>	<p>equipped with its own dispensary, managed by a certified Hospital Assistant, ensuring unrestricted access to medical aid for all workers.</p> <p>In the event of major injuries or health concerns, workers are promptly referred to private clinics or hospitals. The management bears the full cost of such referrals, further emphasizing their commitment to the health and well-being of the workers.</p> <p>Moreover, all workers (including foreign workers) are safeguarded through insurance in compliance with Malaysian Law via contributions to the Social Security Organization (SOCSO). Evidence of these monthly contributions can be found in the PERKESO Monthly Salary Contribution (Form 8A) for the workers, as detailed below:</p> <table border="1" data-bbox="1137 847 1924 1078"> <thead> <tr> <th>Month</th> <th>No. of Workers</th> <th>Total of Contribution (RM)</th> </tr> </thead> <tbody> <tr> <td>February 2024</td> <td>953 workers</td> <td>RM23,120.70</td> </tr> <tr> <td>April 2024</td> <td>920 workers</td> <td>RM 25,118.40</td> </tr> <tr> <td>May 2024</td> <td>976 workers</td> <td>RM 25,813.20</td> </tr> </tbody> </table> <p>As mentioned at Indicator 6.7.2, all accident cases have been reported to SOCSO for compensation purposes. The report and evidence of compensation payment to the affected workers were sighted.</p>	Month	No. of Workers	Total of Contribution (RM)	February 2024	953 workers	RM23,120.70	April 2024	920 workers	RM 25,118.40	May 2024	976 workers	RM 25,813.20	
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>All accident incidents are meticulously reviewed during the safety meetings held quarterly in the operating units. Records pertaining to Lost Time Accidents (LTA) are diligently maintained and</p>	Complied												

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		<p>presented during these meetings. The accident records are regularly updated and readily available for verification.</p> <p>JKKP8 reports have been submitted to the Department of Occupational Safety and Health (JKKP) via the MyKKP Portal before the end of January each year. The details of the submissions are as follows:</p> <table border="1" data-bbox="1137 571 1912 818"> <thead> <tr> <th>Operating Unit</th> <th>JKKP 8 Ref. No.</th> <th>Date of Submission</th> <th>No. of Case(s)</th> <th>No. of Man Lost Day</th> </tr> </thead> <tbody> <tr> <td>UIE POM</td> <td>JKKP 8/125500/2023</td> <td>15/01/2024</td> <td>0</td> <td>0</td> </tr> <tr> <td>UIE Estates</td> <td>JKKP 8/173488/2023</td> <td>26/01/2024</td> <td>3</td> <td>222</td> </tr> </tbody> </table> <p>Overall, occupational injuries are recorded using Lost Time Accident (LTA) metrics, which are implemented by each operating unit of the UIE POM UoC.</p>	Operating Unit	JKKP 8 Ref. No.	Date of Submission	No. of Case(s)	No. of Man Lost Day	UIE POM	JKKP 8/125500/2023	15/01/2024	0	0	UIE Estates	JKKP 8/173488/2023	26/01/2024	3	222	
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Principle 7: Protect, conserve and enhance ecosystems and the environment																		
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																		
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Integrated Pest Management (IPM) is thoroughly documented in United Plantation Berhad’s Standard Operating Procedure (SOP) No. 7, titled “OP Pest Management”. The estates persistently implement biological control measures for oil palm pests, such as leaf-eating pests and rats. The IPM techniques applied at the estates include:</p> <ol style="list-style-type: none"> 1. Cultivation of Beneficial Flowering Plants. 2. Utilization of Natural Control Agents. 3. Regular monitoring of pest numbers and the application of triggers for the initiation of control measures. 	Complied															

		<p>4. Introduction of Barn Owls (<i>Tyto Alba</i>) for the biological control of rats. Barn owl boxes are strategically constructed at a rate of one box for every 15 hectares.</p> <p>5. Planting of beneficial plants, namely <i>Cassia Cobanensis</i>, <i>Antigonon leptopus</i>, and <i>Tunera subulata</i>, in a ratio of 60:20:20 along roadsides to attract natural predators.</p> <p>In terms of implementation sampling, the management conducted a Barn Owl Box (BOB) census in the estate. The barn owl boxes were sighted in the field, and efforts to achieve the target ratio of 1:15 are ongoing. The current occupancy rate is less than 30%.</p> <p>To verify the implementation of the IPM plan, a daily Rhinoceros Beetle (RB) census is conducted. As per the records in the pheromone trap, the quantity of RB did not exceed 20 in a single census. If the census records more than 20 RB, the management resorts to using Cypermethrin for chemical control.</p> <p>These measures ensure a comprehensive and effective approach to pest management, contributing to the sustainable operation of the estates.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>From the list of SOPs established by the management, it has been observed that the management refrains from using species referenced in the Global Invasive Species Database and CABI.org within their plantation.</p> <p>This observation was further confirmed during a field visit, where it was noted that the estate management does not utilize any of the species listed in the Global Invasive Species Database and CABI.org within the areas under their management.</p> <p>This demonstrates the management's commitment to maintaining biodiversity and preventing the introduction of invasive species in their plantation.</p>	Complied

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>This was confirmed during a site visit, where it was observed that the estate does not resort to the use of fire for pest control. Instead, the estate adheres to Good Agricultural Practices (GAP), which include the cultivation of beneficial plants and the application of specific pesticides targeted at controlling specific pests.</p> <p>This approach not only ensures effective pest control but also promotes environmental sustainability within the plantation.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The use of all pesticides has been justified and demonstrated effectively. The written justification for the use of each pesticide is meticulously documented in the Field Manual (Safe Use of Pesticide) under sections S4-S4.2. The selected products are specifically tailored to target particular pests, weeds, and diseases. A review of the records revealed the following practices:</p> <ol style="list-style-type: none"> 1. Circle spray for mature plants – For instance, a combination of glyphosate, amine, and methysulfuron is used. 2. Circle spray for immature plants – Basta, whose active ingredient is glufosinate isophrophylamine, is typically used. 3. Treatment for bagworms and rhinoceros beetles – Cypermethrin, applied using a turbomiser, is the preferred method. 4. Rat baiting – Warfarin is commonly used for this purpose. 5. Cover crop spray – Fusillade is the chosen product for this application. 	Complied

		<p>These practices underscore the estate’s commitment to using pesticides responsibly and effectively, ensuring the health of the crops while minimizing environmental impact.</p>																																																			
<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -</p>	<p>The detailed records of pesticides and their active ingredients used, LD50, the area treated, the amount of active ingredients applied per hectare, and the number of applications have been maintained. Sample record for pesticide usage at Estate 1 for the 4th Quarter of 2023:</p> <table border="1" data-bbox="1137 644 1910 1399"> <thead> <tr> <th>a.i</th> <th>% a.i</th> <th>Quantity</th> <th>Area Sprayed (Ha.)</th> <th>a.i/Ha.</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isopropylamine</td> <td>41</td> <td>18896.07 L</td> <td>7906.74</td> <td>0.9798 L/Ha.</td> </tr> <tr> <td>Metsulfuron Methyl</td> <td>20</td> <td>801050 g</td> <td>9369</td> <td>17.1000 g/Ha.</td> </tr> <tr> <td>Triclopyr Butoxy Ethyl Ester</td> <td>32.10</td> <td>738 L</td> <td>1189</td> <td>0.1992 L/Ha.</td> </tr> <tr> <td>Indaziflam</td> <td>45.5</td> <td>3 L</td> <td>12</td> <td>0.1138 L/Ha.</td> </tr> <tr> <td>2,4-D Methyl Amine</td> <td>60</td> <td>656 L</td> <td>9369</td> <td>0.0420 L/Ha.</td> </tr> <tr> <td>Glufosinate Ammonium</td> <td>18</td> <td>8 L</td> <td>11</td> <td>0.1818 L/Ha.</td> </tr> <tr> <td>Acephate</td> <td>97</td> <td>1194 kg</td> <td>2147</td> <td>0.5394 kg/Ha.</td> </tr> <tr> <td>Propineb</td> <td>70</td> <td>4 kg</td> <td>27</td> <td>0.1037 kg/Ha.</td> </tr> <tr> <td>Flocoumafen</td> <td>0.005</td> <td>4450 kg</td> <td>4005</td> <td>0.0001 kg/Ha.</td> </tr> </tbody> </table>	a.i	% a.i	Quantity	Area Sprayed (Ha.)	a.i/Ha.	Glyphosate Isopropylamine	41	18896.07 L	7906.74	0.9798 L/Ha.	Metsulfuron Methyl	20	801050 g	9369	17.1000 g/Ha.	Triclopyr Butoxy Ethyl Ester	32.10	738 L	1189	0.1992 L/Ha.	Indaziflam	45.5	3 L	12	0.1138 L/Ha.	2,4-D Methyl Amine	60	656 L	9369	0.0420 L/Ha.	Glufosinate Ammonium	18	8 L	11	0.1818 L/Ha.	Acephate	97	1194 kg	2147	0.5394 kg/Ha.	Propineb	70	4 kg	27	0.1037 kg/Ha.	Flocoumafen	0.005	4450 kg	4005	0.0001 kg/Ha.	<p>Complied</p>
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		<p>The usage of all chemicals was based on a “need to do” basis to enhance field operations. Specific pesticides were employed to deal with the respective target pest, weed, or disease. It was found that no Class I chemicals were used, demonstrating the estate’s commitment to responsible and sustainable pest management practices.</p>	
<p>7.2.3</p>	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The estate consistently implements cultural and biological controls to manage pests in the oil palm plantation, including leaf-eating pests and rats. The Integrated Pest Management (IPM) techniques applied at the estate encompass the monitoring of pest populations and the use of triggers for the initiation of control measures. Despite the absence of leaf-eating pest outbreaks, the estate is proactively establishing beneficial plants along main roads and block boundaries to attract natural predators.</p> <p>The estate has an established IPM program that is reviewed on an annual basis. The program includes the planting of beneficial plants, conducting a rat damage census, and performing a Ganoderma census. The pesticide reduction program is monitored on a per-hectare basis to ensure effective and responsible use of pesticides.</p> <p>The quantity of agrochemicals required for various field conditions is documented and justified in the United Plantation UIE Standard Operating Procedure. This is part of the estate’s strategy to reduce the use of herbicides and pesticides. The implementation of these procedures in the field has been consistent.</p> <p>The estates have implemented a Continuous Improvement Plan, which includes a commitment to reduce the usage of chemicals through the implementation of the Integrated Pest Management Plan. During site visits at all the estates, the establishment of beneficial plants along the estate roads and immature areas was</p>	<p>Complied</p>

		observed, as well as the strategic placement of barn owl boxes. The use of Paraquat has been eliminated and replaced with alternatives such as Glyphosate.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	Based on the site visit, records review, and interview with chemical handlers, it verified that there was no prophylactic use of pesticides at the estates.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	Based on documentation reviews, site visits, and interviews with relevant personnel, it was observed that UIE Estates refrains from using pesticides categorised as World Health Organisation Class 1A or 1B, those listed by the Stockholm or Rotterdam Conventions, and Paraquat. UIE Estates has adopted the UP Plantation Berhad policy of not using Paraquat and pesticides categorised by WHO as Class 1A or 1B, as per the Occupational Safety and Health Policy approved by the Chief Executive Director on 08/03/2021. In accordance with this policy, the use of Paraquat has been eliminated at UIE Estates. It has been replaced with contact or systemic herbicides such as Glyphosate Isopropylammonium, Triclopyr Butotyl, 2,4-D-Dimethylammonium, Indaziflam, Monosodium Methanearsonate (MSMA), 1,1-Dimethyl, 3- (3',4'-Dichlorophenyl) Urea (DCMU), Glufosinate Ammonium, Metsulfuron-Methyl, Sodium Chlorate, etc. Additionally, Monocrotophos has been eliminated and replaced with less hazardous alternatives such as Acephate. The Chemical Registers for UIE Estates are available for verification. They are reviewed annually and whenever new chemicals are introduced into the operations. The register indicates that the only exceptions are 2,4-D Dimethylammonium and Cypermethrin, which are Class II chemicals. All other chemicals used are of Class III & IV.	Complied

7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticide operators at UIE Estates have undergone training on the safe handling and application of pesticides, in compliance with the Occupational Safety and Health (Use and Standard of Exposure Chemical Hazardous to Health) Regulations 2000 (USECHH Regulations). The training records sampled from UIE Estates include:</p> <ul style="list-style-type: none"> • Integrated Pest Management (IPM) Plans (13/03/2024) • Circle Sanitation (19/02/2024) • Chemical Premix (19/06/2024) • Pest & Disease (P&D) (25/01/2024) • Spraying – Mechanization (18/01/2024) • Spraying – Manual (13/01/2024) • High Conservation Value (HCV) Awareness (19/01/2024) • Environmental Policy (19/01/2024) <p>The training covers a range of topics, including areas where pesticide spraying and fertilizer application are prohibited, spraying techniques, precautions, and symptoms of toxic reactions such as skin disorders, rashes, mouth and throat pain, breathing difficulties, and nail problems.</p> <p>All precautions attached to the pesticides, as outlined in the Safety Data Sheets (SDS), have been observed, applied, and understood by the workers.</p> <p>The training programs and records have been verified and found to be satisfactory.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>UIE Estates is adhering to the Standard Operating Procedure established by UPB for the handling of chemicals. This ensures proper and safe handling and storage in accordance with the</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Occupational Safety Health Requirement (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. This is documented in the OSH Manual- Section 5: Handling Storage Chemical, which was revised in June 2023.</p> <p>Pesticides are securely stored in the Chemical Store, which is kept locked at all times. During the site visit, the storekeeper was observed unlocking the entrance door for the auditor to inspect the store. Safety signage, hazardous signage, and signage requiring the use of Personal Protective Equipment (PPE) were prominently displayed at the entrance. The Chemical Store signage, complete with the required Hazard Symbols, was also present at the entrance.</p> <p>The chemical store is equipped with a working ventilation fan, ensuring adequate ventilation. An up-to-date chemical register, along with the trade and generic names of the chemicals and their Safety Data Sheets (SDS), were readily available. The SDS are provided in both English and Bahasa Malaysia, which are understood by the workers.</p> <p>Chemicals are mixed in the pre-mixing areas of the store, which is also kept under lock and key. In case of accidents, an emergency shower and eye wash station are available at the pesticide store. The water pressure at these facilities was noted to be sufficient.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticide containers at UIE Estates undergo a thorough process before disposal. They are triple rinsed, punctured, and stored separately. This process is guided by the Standard Operating Procedure (SOP) for Triple Rinsing. All pesticide containers are subjected to this procedure before being disposed of to DOE-approved contractors.</p> <p>Records on the disposal and recycling of chemical containers and fertiliser bags were made available during the audit. These</p>	Complied

		records, which include details on usage and disposal, are well-documented. The latest disposal was carried out on 02/04/2024 by a DOE-approved contractor, as evidenced by consignment note no. 2024040210DT3P4A. The waste was classified as SW409.	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial spraying is strictly prohibited by the management of United Plantation Berhad.</p> <p>Based on a thorough review of documentation (including chemical usage records, chemical register, justification of pesticides, chemical bin cards, and chemical stock purchase), site visits, and interviews with relevant personnel (such as the storekeeper and workers), it was observed that UIE Estates adheres to this prohibition.</p> <p>No instances of aerial spraying were found during this audit. Therefore, it can be confirmed that this instruction is being adhered to at the UoC.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Chemical handlers at each operating unit of UIE POM Unit of Certification undergo medical examinations under the Medical Surveillance Programme. This is due to their exposure to potentially hazardous chemicals, as stipulated in the Use and Standard of Exposure or Chemicals Hazardous to Health (USECHH) Regulations 2000 under the Occupational Safety & Health Act (OSHA) 1994.</p> <p>Records show that workers handling chemicals were sent for medical surveillance. At the UIE Palm Oil Mill, this was conducted by HQ/14/DOC/00/380 on three workers, all of whom were declared fit to work. At UIE Estates, 81 field workers, 10 fitters, and 2 carpenters were tested on 02/01/2024 by the same OHD Doctor, and all were found fit to work.</p> <p>No abnormalities were reported by the Occupational Health Doctor (OHD). The medical reports indicated no cases of low blood</p>	Complied

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		<p>cholinesterase levels, a condition that would render a worker unfit for work with pesticides. As of the date of the audit, no such cases were found in the UoC.</p> <p>In addition to the annual medical surveillance, monthly clinical checks are carried out by the Hospital Assistant on the chemical handlers. These checks cover the gastrointestinal and urinary systems, as well as pregnancy tests. Records of medical surveillance and monthly health checks were available and satisfactorily maintained.</p> <p>During site visits, chemical handlers were interviewed, and they reported no symptoms of toxic reactions such as skin disorders, rashes, mouth and throat pain, breathing difficulties, or nail problems.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>UIE POM and UIE Estates maintain a clear worker list, with each worker's type of work explicitly stated. Based on the Employees Registration Record of Employment, on-site field inspections, and interviews, it has been verified that all chemical handlers are male and no work with pesticides is undertaken by persons under the age of 18.</p> <p>For individuals with medical restrictions, the Unit of Certification (UoC) complies with Part X (Medical Removal Protection) – Regulation 28 of the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000. This regulation stipulates:</p> <ul style="list-style-type: none"> i. The employer shall not permit an employee to be engaged in and shall remove him from any work that exposes or likely to expose him to chemicals hazardous to health on each occasion that the medical finding, determination or opinion expressed by an occupational safety and health officer who is also a medical practitioner or by an occupational health 	Complied

		<p>doctor shows that the employee has a detected medical condition which places him at increased risk of material impairment to health from exposure to chemicals hazardous to health.</p> <ul style="list-style-type: none"> ii. The employer, after being notified by an occupational safety and health officer who is also a medical practitioner or an occupational health doctor of the fact, shall not permit a pregnant employee or breastfeeding employee to be engaged in, and shall remove the employee from work which may expose or is likely to expose the employee to chemicals hazardous to health. iii. The employer shall return an employee to his former job- <ul style="list-style-type: none"> (a) for an employee removed in accordance with sub regulation (1), when a subsequent medical determination results in a medical finding, determination or opinion which shows that the employee no longer has the detected medical condition; or (b) for an employee removed in accordance with sub regulation (2), at the appropriate time where the employee is no longer pregnant or breastfeeding a child. iv. For the purpose of this regulation, "medical practitioner" means a medical practitioner registered under the Medical Act 1971 [Act 50]. <p>In line with the guidance outlined in the Chemical Health Risk Assessment (CHRA) report, employees involved in tasks related to chemicals are required to undergo annual medical surveillance. If a worker is deemed "Not Fit To Work," the Occupational Health Doctor (OHD) will suggest "Medical Removal" for that individual. However, based on the latest results from medical surveillance, it</p>	
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		has been determined that all employees are fit to work. Therefore, no recommendations for "Medical Removal" have been made by the OHD based on the current assessments.	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	The operating units had identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows: 1. Domestic waste – rubbish from the mill and estates complex and employees’ quarters (disposed by estate management). 2. Recycled waste – Fibre, palm kernel shell, boiler ash, empty fruit bunches, scrap iron, plastic, glass, metal, paper, fertilizer bags 3. Scheduled waste – Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, chemicals containers, clinical waste, used PPE. 4. Domestic waste – rubbish from the mill complex and employees’ quarters (disposed by estate management). 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, a minor NC was issued.	Non-compliance
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	<u>UIE Estate</u> The inventory of the waste generated is recorded using the "E-SWISS" inventory system. All SW are disposed to EDSHA Solutions Sdn Bhd (license no 004253 valid till 30/04/2025) and SW 404 disposed to Future NRG Sdn Bhd Seremban NS Sdn Bhd (license 006044 expiring 30/04/25). The estate combined despatch with	Complied

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		<p>the mill SW under the central workshop management for other types of SW. Empty containers are tripled rinsed and sold as non-SW.</p> <table border="1" data-bbox="1263 499 1865 598"> <tr> <th>Date</th> <th>SW410</th> <th></th> <th>Date</th> <th>SW409</th> </tr> <tr> <td>02/04/2024</td> <td>0.010</td> <td></td> <td>02/04/2024</td> <td>0.500</td> </tr> </table> <table border="1" data-bbox="1263 649 1865 748"> <tr> <th>Date</th> <th>SW404</th> <th></th> <th>Date</th> <th>SW404</th> </tr> <tr> <td>07/06/2024</td> <td>0.018</td> <td></td> <td>20/01/2024</td> <td>0.003</td> </tr> </table> <p><u>UIE POM</u></p> <p>All SW are disposed to YOKOHAMA Reclamation Sdn Bhd Kinta Peraj / Sdn Bhd / EDSA Solutions Sdn Bhd Kinta Perak Riyaland Sdn Bhd Huku Selangor / SP Metro (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;</p> <table border="1" data-bbox="1155 1027 1910 1326"> <thead> <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> </thead> <tbody> <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> </tbody> </table>	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	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	-	
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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	No evidence of the unit of certification use open fire for waste disposal.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>UIE Estates adheres to good agricultural practices as outlined in the Standard Operating Procedures (SOP) manual. SOP No. 8: Manuring Immature and Mature Oil Palm ensures soil fertility is managed to a level that promotes optimal and sustained yield. This SOP covers the application of fertiliser for various stages of palm age and techniques. The type of fertilisers and dosage are recommended by the agronomy unit through analysis of foliar and soil.</p> <p>UIE Estates continues to maintain long-term soil fertility through annual application of fertiliser, based on foliar sampling and soil analysis. Other practices include biomass retention, where pruned fronds are left to decompose in the fields, and the application of Empty Fruit Bunches (EFB) in some fields.</p> <p>The application of fertilisers, a paramount practice for maintaining soil fertility, is carried out based on the recommendations made by the UP Research Department (UPRD). The Deputy Group Manager, Assistant Managers, and staff monitor the application of fertilisers. Records for types and quantities of fertilisers applied are accurately monitored and updated.</p>	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>Leaf sampling and analysis at UIE Estates are conducted annually, while soil sampling and analysis are carried out as necessary to determine nutrient levels and deficiencies. Both sampling and analysis were conducted by the UP Research Department (UPRD).</p> <p>The tissue/leaf sampling and analysis focus on major elements (% on dry matter) such as Nitrogen (N), Phosphorus (P), Potassium (K), Magnesium (Mg), and Calcium (Ca), as well as trace elements</p>	Complied

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		<p>(ppm on dry matter) such as Boron (B), Copper (Cu), Zinc (Zn), Iron (Fe), and Manganese (Mn). The most recent Commercial Field Foliar Samples were taken between 05-15 Dec 2023, received on 01/04/2024, analysed between 07-09 April 2024, and reported on 10 May 2024.</p> <p>Soil analysis, which includes parameters such as pH, Organic Carbon (Org C), Total Nitrogen (Total N), Total Phosphorus (Total P), Available Phosphorus (Avail P), Exchangeable Potassium (Exchange K), Exchangeable Calcium (Exchange Ca), and Exchangeable Magnesium (Exchange Mg), is carried out on a yearly cycle. The most recent analysis was conducted during the latest Agronomist Visit on 07/02/2024.</p> <p>Based on these analyses, the Agronomist Report provides recommendations for rounds of fertilizer applications needed for each identified estate field block to sustain long-term soil fertility and nutrient efficiency. Records of the sampling and analysis have been verified and are satisfactorily maintained.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>UIE Estate used the POME from mill, site visit at estate verified that the POME was applied through land application at block 82. EFB application for 2023 recorded at 37.8 mt/ha and to date 2024 recorded at 34.39 mt/ha</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Annual fertilizer inputs at UIE Estates are monitored through fertilizer recommendations. The types of fertilizers recommended for application in 2024 include UP Compound, Urea, Muriate of Potash (MoP), Borate, Zinc, Rock Phosphate (RP), Triple Superphosphate (TSP), Ground Magnesium Limestone (GML), Kieserite, and NK Mix.</p> <p>The fertilizer application program is monitored using various records such as program sheets, bin cards, field cost books, and fertilizer application monitoring forms. These records were</p>	Complied

		<p>reviewed by auditors, revealing that the actual fertilizers applied in 2024 were in line with the program. For instance, the fertilizer application records sampled are as follows:</p> <ul style="list-style-type: none"> • Muriate of Potash (MoP) was applied on 25/06/2024 at a rate of 2.4 kg per palm in Field 2A. • Urea was applied on 13/06/2024 at a rate of 1.0 kg per palm in Field 2A. • Kieserite was applied on 21/04/2024 at a rate of 2.0 kg per palm in Field 2A. <p>Overall, the implementation of the fertilizer program at UIE Estates is effective and records of fertilizer inputs are satisfactorily maintained by the management.</p>																									
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>																											
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>UIE Estates maintains detailed soil maps that outline the soil profile, including marginal and fragile soils. These maps were developed in collaboration with UP Research and Param Agriculture Soil Survey (PASS) as part of the Soil Survey Report of UIE Estate in January 2018. The soil series details are as follows:</p> <table border="1" data-bbox="1137 1061 1912 1380"> <thead> <tr> <th>Soil Series</th> <th>Slope Class (%)</th> <th>Ha.</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Rengam</td> <td>Rolling (12-24)</td> <td>13.00</td> <td>0.10</td> </tr> <tr> <td>Sogomana</td> <td>Level (0-4)</td> <td>2,186.70</td> <td>21.20</td> </tr> <tr> <td>Cherang Hangus</td> <td>Level (0-4)</td> <td>1806.30</td> <td>17.50</td> </tr> <tr> <td>Cherang Hangus/ Organic</td> <td>Level (0-4)</td> <td>446.70</td> <td>4.30</td> </tr> <tr> <td>Lunas</td> <td>Level (0-4)</td> <td>70.50</td> <td>0.70</td> </tr> </tbody> </table>	Soil Series	Slope Class (%)	Ha.	%	Rengam	Rolling (12-24)	13.00	0.10	Sogomana	Level (0-4)	2,186.70	21.20	Cherang Hangus	Level (0-4)	1806.30	17.50	Cherang Hangus/ Organic	Level (0-4)	446.70	4.30	Lunas	Level (0-4)	70.50	0.70	<p>Complied</p>
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>UIE Estates has implemented effective practices to minimize and control soil erosion and degradation. According to the contour map, there are no steep areas in the estate, with the highest slope ranging from 10° to 15°.</p> <p>Several measures have been put in place to protect the soil:</p> <ul style="list-style-type: none"> • Proper stacking of fronds: This helps to reduce soil erosion and maintain soil moisture. • Application of Empty Fruit Bunches (EFB): This contributes to soil fertility and helps prevent soil erosion. • Avoidance of blanket spraying: This practice reduces the risk of chemical runoff, which can lead to soil degradation. • Construction of terraces: Terracing helps to control erosion on slopes by reducing the speed of water runoff. 		Complied																								

		<ul style="list-style-type: none"> • Road maintenance: Regular maintenance of estate roads prevents soil erosion caused by runoff during the rainy season. • Maintenance of soft vegetation in the interlines: This helps to hold the soil together, preventing erosion. <p>In addition to these measures, cover crops have been planted in replanted areas and certain mature areas. The cover crop <i>Mucuna Bracteata</i> has been planted along crucial slopes by management. Large areas with <i>Neprolepis Biserrata</i>, another type of cover crop, were observed in the inter rows during the visit.</p>									
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Based on a thorough review of documentation, observations made, and interviews conducted with management, it has been confirmed that there is no evidence of new acquisitions of lands from other parties or new planting activities being practiced at the UIE Estates. Therefore, it can be definitively stated that there is no new planting of oil palm on steep terrain at UIE Estates.	Complied								
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.											
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	<p>Based on a comprehensive review of documentation, site observations, and interviews with management, it has been confirmed that UIE Estates has not engaged in new acquisitions of lands from other parties or initiated new planting activities.</p> <p>However, UIE Estates maintains detailed soil maps that outline the soil profile, including marginal and fragile soils. These maps were developed in collaboration with UP Research and Param Agriculture Soil Survey (PASS) as part of the Soil Survey Report of UIE Estate in January 2018. The details of the soil series are as follows:</p> <table border="1"> <thead> <tr> <th>Soil Series</th> <th>Slope Class (%)</th> <th>Ha.</th> <th>%</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Soil Series	Slope Class (%)	Ha.	%					Complied
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7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Based on a comprehensive review of documentation, site observations, and interviews with management, it has been confirmed that UIE Estates has not engaged in new acquisitions of lands from other parties or initiated new planting activities.</p> <p>During site verification, it was observed that there was no extensive planting on peat soil or fragile soil. All management</p>	Complied																																												

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		practices were carried out according to the Standard Operating Procedure (SOP) for Peat Subsidence Measurement, dated 31/3/2014.																																													
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>Based on a comprehensive review of documentation, site observations, and interviews with management, it has been confirmed that UIE Estates has not engaged in new acquisitions of lands from other parties or initiated new planting activities.</p> <p>However, UIE Estates maintains detailed soil maps that outline the soil profile, including marginal and fragile soils. These maps were developed in collaboration with UP Research and Param Agriculture Soil Survey (PASS) as part of the Soil Survey Report of UIE Estate in January 2018. The details of the soil series are as follows:</p> <table border="1" data-bbox="1137 810 1924 1385"> <thead> <tr> <th>Soil Series</th> <th>Slope Class (%)</th> <th>Ha.</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Rengam</td> <td>Rolling (12-24)</td> <td>13.00</td> <td>0.10</td> </tr> <tr> <td>Sogomana</td> <td>Level (0-4)</td> <td>2,186.70</td> <td>21.20</td> </tr> <tr> <td>Cherang Hangus</td> <td>Level (0-4)</td> <td>1806.30</td> <td>17.50</td> </tr> <tr> <td>Cherang Hangus/ Organic</td> <td>Level (0-4)</td> <td>446.70</td> <td>4.30</td> </tr> <tr> <td>Lunas</td> <td>Level (0-4)</td> <td>70.50</td> <td>0.70</td> </tr> <tr> <td>Segari</td> <td>Level (0-4)</td> <td>172.40</td> <td>1.70</td> </tr> <tr> <td>Briah</td> <td>Level (0-4)</td> <td>1539.00</td> <td>14.90</td> </tr> <tr> <td>Jawa</td> <td>Level (0-4)</td> <td>1434.90</td> <td>14.00</td> </tr> <tr> <td>Sedu</td> <td>Level (0-4)</td> <td>1819.30</td> <td>17.60</td> </tr> <tr> <td>Liku/deep</td> <td>Level (0-4)</td> <td>614.40</td> <td>6.00</td> </tr> </tbody> </table>	Soil Series	Slope Class (%)	Ha.	%	Rengam	Rolling (12-24)	13.00	0.10	Sogomana	Level (0-4)	2,186.70	21.20	Cherang Hangus	Level (0-4)	1806.30	17.50	Cherang Hangus/ Organic	Level (0-4)	446.70	4.30	Lunas	Level (0-4)	70.50	0.70	Segari	Level (0-4)	172.40	1.70	Briah	Level (0-4)	1539.00	14.90	Jawa	Level (0-4)	1434.90	14.00	Sedu	Level (0-4)	1819.30	17.60	Liku/deep	Level (0-4)	614.40	6.00	Complied
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Rudua	Undulating (4-12)	211.80	2.00				
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.							
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a comprehensive review of documentation, site observations, and interviews with management, it has been confirmed that UIE Estates has not engaged in new acquisitions of lands from other parties or initiated new planting activities. Therefore, it can be definitively stated that there is no new planting on peat, regardless of depth, after 15 November 2018 in existing and new development areas at UIE Estates. All current oil palm plantings are third-generation plantings on already established oil palm estates.</p>	Complied				
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>It has been confirmed that the peat inventory for all United Plantation Estates was submitted to the RSPO Secretariat. The first submission was made in June 2020, as verified by an email dated 5/6/2021. The most recent submission, which included updates to the peat area, was sent on 13/01/2023.</p>	Complied				
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>UIE Estates has implemented comprehensive monitoring systems to track peat subsidence and water table height.</p>	Complied				

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		<p>Five Peat Subsidence Probes were installed on 07/04/2008 to monitor peat subsidence. The data for Probe ID 2 is as follows:</p> <table border="1"> <thead> <tr> <th>Reading Period</th> <th>Reading Date</th> <th>Measurement from ground (cm)</th> </tr> </thead> <tbody> <tr> <td>March</td> <td>01/03/2023</td> <td>4</td> </tr> <tr> <td>June</td> <td>30/06/2023</td> <td>4</td> </tr> <tr> <td>Sept</td> <td>30/09/2023</td> <td>4.3</td> </tr> <tr> <td>Dec</td> <td>30/12/2023</td> <td>4.7</td> </tr> <tr> <td colspan="2">Mean</td> <td>4.25</td> </tr> </tbody> </table> <p>In addition, 11 Piezometers were installed to monitor the water table height. When the water level drops below 40 cm, the management intervenes to increase the water level, ensuring it remains within the 40 – 60 cm range as per the procedure dated 31/03/2014. Data from a visit to Piezometer No. 6 is as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Water Reading (cm)</th> <th>Water Table Height (cm)</th> </tr> </thead> <tbody> <tr> <td>04/05/2024</td> <td>129</td> <td>89</td> </tr> <tr> <td>11/05/2024</td> <td>124.5</td> <td>84.5</td> </tr> <tr> <td>18/05/2024</td> <td>60.5</td> <td>20.5</td> </tr> <tr> <td>25/05/2024</td> <td>75</td> <td>54</td> </tr> <tr> <td>Average</td> <td>97.25</td> <td>62</td> </tr> </tbody> </table>	Reading Period	Reading Date	Measurement from ground (cm)	March	01/03/2023	4	June	30/06/2023	4	Sept	30/09/2023	4.3	Dec	30/12/2023	4.7	Mean		4.25	Date	Water Reading (cm)	Water Table Height (cm)	04/05/2024	129	89	11/05/2024	124.5	84.5	18/05/2024	60.5	20.5	25/05/2024	75	54	Average	97.25	62	
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		Overall, the management of UIE Estates thoroughly monitors peat subsidence and maintains satisfactory records of these measurements.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>UIE Estates has a documented water and ground cover management system in place under its water management program. The management implements water table monitoring on a weekly basis, as per the Standard Operating Procedures (SOP) 4.5 Peat Subsidence Measurements, which was issued on 31/3/2014 and revised on 1/8/2020.</p> <p>The program includes a Study Methodology for Piezometer Placement and Monitoring in Peat Areas. As part of this methodology, one piezometer is placed every 120 hectares to monitor the natural water table of the peat areas.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>Following the review of the replanting programme and business plan, as well as an interview with UIE Estates management, it has been confirmed that no replanting activities involving peat soil areas are planned for the next five years. The long-term replanting schedule of UIE Estates suggests that the earliest replanting activity in these peat soil areas is projected for 2035.</p> <p>Consequently, drainability assessments, which should be conducted at least five years prior to replanting according to the RSPO Drainability Assessment Procedure or other RSPO recognised methods, have not yet been initiated by the UP Research Department (UPRD).</p>	Complied

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<p>7.7.6</p>	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>The existing plantation on peat at UIE Estates is managed in line with the RSPO Manual on Best Management Practices. This includes the integration of the SOP for Peat Subsidence Measurement (dated 31/3/2014) into UIE Estates' own SOP, as well as compliance with MPOB guidance.</p> <p>Constant monitoring of water levels and soil subsidence is conducted to maintain optimal conditions. Records of these measurements were made available during the audit. Tools such as piezometers, subsidence poles, drain gauge pie scales, and stream gauges have been strategically installed to accurately represent the area.</p> <p>The implementation of these measures has been verified as per indicator 7.7.3 above.</p> <p>UIE Estates has a comprehensive fire prevention and control plan in place. This includes adequate firefighting equipment such as water tanks, boozers, extinguishers, etc. The Fire Danger Rating System (FDRS) signage is prominently displayed, providing a clear indication of the potential level of danger in the event of a fire.</p> <p>Regular maintenance of bunds for optimum water level is carried out. This is crucial as dry peat can lead to natural burning of the area.</p>	<p>Complied</p>
<p>7.7.7</p>	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>The set-aside at UIE Estates encompasses two distinct areas: the Bek Nielsen Sanctuary Field 51 and Field 97. These areas are managed in strict accordance with the Standard Operating Procedures (SOP) for Peat Subsidence Measurements, issued on 31/3/2014 and subsequently revised on 1/8/2020.</p> <p>Upon verification as per Indicator 7.7.3, it has been noted that the management at UIE Estates is effectively managing the peat areas. The UIE Estates management are adhering to the RSPO's Best Management Practices (BMPs) for the Management and</p>	<p>Complied</p>

		Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat. This adherence aligns with the latest version of these BMPs (Version 2, 2019) and the associated audit guidance.																				
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.																						
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>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;</p> <ul style="list-style-type: none"> - Implementation of rain water harvest, - scheduled water pumping for effective management from the source Sg Bruas. - daily monitoring of bund / scheduled maintenance - Optimum usage of water and monitor for any leakage in the system. <p>The water sources and usage are shown below as shown below:</p> <table border="1"> <thead> <tr> <th>Water sources</th> <th>Usage</th> <th>Monitoring</th> </tr> </thead> <tbody> <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>Rain water</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> </tbody> </table> <p>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 border="1"> <tr> <td></td> <td>2021</td> <td>2022</td> <td>2023</td> </tr> </table>	Water sources	Usage	Monitoring	Extraction Sg Bruas	mill processing	Monitoring water supply	LAP - Water supply	Domestic use	Monitoring water supply	Rain water	External use/ Workshop	Rain fall data	Water tank	Emergency water supply	-		2021	2022	2023	Complied
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7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>United Plantations Berhad has continued to implement the SOP on Management of Riparian Area dated November 2021. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the SOP No 12: Protection of River Reserves (Riparian & Buffer Zone). The buffer zones established are as following:</p> <table border="1"> <thead> <tr> <th>River width (m)</th> <th>Buffer zone width (m)</th> </tr> </thead> <tbody> <tr> <td>1 – 5</td> <td>5</td> </tr> <tr> <td>5 – 10</td> <td>10</td> </tr> <tr> <td>10 – 20</td> <td>20</td> </tr> <tr> <td>20 – 40</td> <td>40</td> </tr> <tr> <td>> 40</td> <td>50</td> </tr> </tbody> </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>Water sampling was taken annually to test against the industrial effluent water analysis at 10 points in the estate including</p>	River width (m)	Buffer zone width (m)	1 – 5	5	5 – 10	10	10 – 20	20	20 – 40	40	> 40	50	Complied				
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		<p>inlet/outlet of Sg Anak Machang, Sg Bruas and 6 canal points in the estate. Analysis as shown below;</p> <table border="1" data-bbox="1155 443 1895 938"> <thead> <tr> <th></th> <th colspan="2">Sg Bruas</th> <th colspan="2">Sg Anak Machang</th> </tr> <tr> <th>04/10/2023</th> <th>Inlet</th> <th>Outlet</th> <th>Inlet</th> <th>Outlet</th> </tr> </thead> <tbody> <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> <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> </tbody> </table> <p>All results are classified in ware class III and with parameters complying to the standard</p> <p>a) 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> <ol style="list-style-type: none"> i. Regular inspection at buffer/HCV areas ii. Monitor water from surrounding areas iii. Track, measure and report all activities around river iv. Train and educate workers 		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	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>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.</p> <table border="1" data-bbox="1200 603 1805 1050"> <thead> <tr> <th>19/03/2024</th> <th>Inlet Field 01</th> <th>Outlet Field 110</th> </tr> </thead> <tbody> <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> </tbody> </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	
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor 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</p>	Complied																											

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		<p>mg/l except for pH). Analysis is made by Union Laboratories Sdn Bhd located in Seberang Prai Pulau Pinang.</p> <table border="1" data-bbox="1153 435 1843 751"> <thead> <tr> <th>Parameters</th> <th>Std</th> <th>17/01/24</th> <th>06/02/24</th> <th>05/03/24</th> </tr> </thead> <tbody> <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> </tbody> </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> <ul style="list-style-type: none"> i. Effluent pond system – to remove solid content in cooling pond under desludging program ii. Commissioning of new decanter in Dec 2023, reducing solids 	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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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The water consumption with comparison in three financial years is shown below; (Unit in mt)</p> <table border="1" data-bbox="1153 1129 1888 1281"> <thead> <tr> <th>Details</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <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> </tbody> </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	Complied																													
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<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																																																

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>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:</p> <table border="1" data-bbox="1144 576 1906 1131"> <thead> <tr> <th>Action</th> <th>Document</th> <th>PIC</th> </tr> </thead> <tbody> <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> <tr> <td>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.</td> <td>New processing line</td> <td>Process supervisor</td> </tr> <tr> <td>Removing the no. of aging motorbike from service has gradually reduce the petrol consumption</td> <td>Vehicle maintenance record</td> <td>Tractor workshop fitter</td> </tr> </tbody> </table> <p>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;</p>	Action	Document	PIC	Closely monitoring of vehicle usage as well on repair and maintenance	Vehicle maintenance record	Tractor workshop fitter	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	<p>Complied</p>
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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Energy Monitoring</td> <td style="width: 20%;">2023</td> <td style="width: 20%;">2024</td> </tr> <tr> <td>Turbine (kWh/ mt CPO)</td> <td>97.33</td> <td>92.35</td> </tr> </table> <p>Variation of ratio in the analysis were explained and justified. Under the energy management plan 2024 the mill aimed for reduction plan among others;</p> <ol style="list-style-type: none"> i. educate workers on fuel saving practice avoid leakages during vehicles maintenance 	Energy Monitoring	2023	2024	Turbine (kWh/ mt CPO)	97.33	92.35	
Energy Monitoring	2023	2024							
Turbine (kWh/ mt CPO)	97.33	92.35							
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.									
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating units. The plan to reduce or minimise the GHG emission has been established and incorporated with its plan to prevent pollution. Among the action plans were: <ul style="list-style-type: none"> To optimize the usage of diesel To ensure efficiency of ETP by not processing FFB more than licensed limit To conduct training to the employees on chemical handling Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was accurate.	Complied						
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from	No development within UIE Certification Unit since 2014.	Complied						

	<p>the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>		
<p>7.10.3</p>	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>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 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 CSK Murni Services 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</p>	<p>Complied</p>

		<p>stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.</p> <table border="1" data-bbox="1182 443 1843 579"> <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	
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Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area																			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>The Group policy of "Zero open burning" is enforced since July 2008. The operating units 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. Both estates had replanting program spanned over the forthcoming years. UPB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) Environment and Biodiversity Policy b) Replanting SOP - Under felling/clearing & land preparation. <p>There was no land prepared by burning and in line with the Environment and Biodiversity Policy signed by the Chief Executive Director dated 08/03/2021.</p>	Complied																
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>GFW @ Global Forest Watch, fire alerts (VIIRS) will send to notify there is any fire incident/outbreak occurred within UPB concession area in Malaysia and Indonesia. The fire prevention procedure has been established to ensure no fire breakout happen in estate. Fire</p>	Complied																

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		drill and fire extinguishing training for emergency team in collaboration with local authority. No fire alert received since last year audit.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement process with adjacent stakeholder is done via smallholder field day and annual stakeholder meeting. Latest stakeholder meeting was carried out on 23/5/24 for UIE Business Unit.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	There was no new land clearing since November 2005 in UIE estate. This was confirmed with land statement and site verification. There also confirm during with stakeholder consultation.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. PROCEDURAL NOTE:	Initial HCV assessment was conducted by Wild Asia as per report entitled "A Conservation Assessment of United Plantation's Perak Estates – Conservation Values & Recommendations"; Report date: 14/1/2008. HCV report has been reviewed on 05/08/2020 by Sustainability Manager. From the declaration of HCV, the UIE estate only has 1 HCV 4 (riparian Sg Anak Machang) with total 12.53ha. The in-house assessment was referred to the Common Guidance for the identification of High Conservation Values endorsed by HCV Resource Network in September 2017. There is also the area that is recognized by the management as conservation area. The total conservation area was 105.18 ha as per below verification: • Kingham-Cooper Nursery with total 20.23 ha	Complied

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	<p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Bek-Nielsen Sanctuary with total 74.42 ha • Bukit Kecil Jungle Reserve with total 10.53 ha • Sg Beruas reserve land (bund) with total 22.92 ha (outside concession area) <p>From the verification on report, site visit on all area conservation and also interview with the stakeholder and workers, the summary of high conservation area (HCV) in UIE estate as per below:</p> <table border="1" data-bbox="1137 619 1912 719"> <thead> <tr> <th>HCV category</th> <th>Area (ha)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>HCV 4 (riparian reserve)</td> <td>12.53 ha</td> <td>Sg Anak Machang</td> </tr> </tbody> </table>	HCV category	Area (ha)	Remarks	HCV 4 (riparian reserve)	12.53 ha	Sg Anak Machang	
HCV category	Area (ha)	Remarks							
HCV 4 (riparian reserve)	12.53 ha	Sg Anak Machang							
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable						
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>UIE estate have established and review the HCV management plan dated 23/08/20203 for the HCV identified area based on assessment conducted. The management plan focus on Conservation Status of Flora and Fauna, Human and Wildlife Conflict, Periodical Monitoring, Pollution Waterway, No disturbance to the Buffer zone and set aside area, Stakeholder engagement, and training for personnel and employee.</p> <p>Management plan established for HCV 4 (riparian reserve) summarized as:</p> <table border="1" data-bbox="1137 1086 1912 1362"> <thead> <tr> <th>Recommendation/management plan</th> <th>Monitoring frequency</th> </tr> </thead> <tbody> <tr> <td>To set aside a riparian as per SOP on maintenance of buffer zone</td> <td>Monthly/on-going</td> </tr> <tr> <td>To erect proper signboards at strategic points along boundary to buffer zone to prevent illegal activities</td> <td>Monthly/on-going</td> </tr> </tbody> </table>	Recommendation/management plan	Monitoring frequency	To set aside a riparian as per SOP on maintenance of buffer zone	Monthly/on-going	To erect proper signboards at strategic points along boundary to buffer zone to prevent illegal activities	Monthly/on-going	Complied
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		<p>Prohibition of agrochemical and manuring activities at self-declared set-aside conservation</p> <p>Avoidance of spraying and manuring at artificial drain leading to the gazetted river.</p>	Monthly/on-going	
		<p>To ensure the water course is clear and no blockage.</p> <p>No construction of bunds/weir/dams</p>	Monthly/on-going	
		<p>To monitor on monthly basis for soil erosion, pollution, signs of illegal activities and new sightings of ERT etc.</p>	Monthly/on-going	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No HCV with existing rights of local communities have been identified in the HCV reports in both initial HCV report carried out in 2018 and internal HCV report in August 2020.</p>		Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The estates has established HCV management plan for the HCV identified during assessment conducted. The management plan focuses on Conservation Status of Flora and Fauna, Human and Wildlife Conflict, Periodical Monitoring, Pollution Waterway, No disturbance to the Buffer zone and set aside area, Stakeholder engagement, and training for personnel and employee. Latest awareness briefing on HCV was carried out on 17/1/2024.</p>		Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored using HCV/Conservation area monitoring checklist on monthly basis. No issues of concern recorded which require to be fed back into the management plan.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas. Not applicable since there is no land clearing after November 2005.</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **UIE POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **UIE POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.37
PKO	0

Extraction	%
OER	21.68
KER	4.42

Production	t/yr
FFB Process	290,613.00
CPO Produced	63,014.00
PKO Produced	12,854.00

Land Use	Ha
OP Planted Area	7,743.16
OP Planted on peat	1,206.40
Conservation (forested)	91.00
Conservation (non-forested)	0
Total	9,040.56

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	88,386.08	0.30	0	0	0	0	88,386.08	0.30
CO ₂ Emission from fertilizer	13,243.80	0.05	0	0	0	0	13,243.80	0.05
NO ₂ Emission	21,295.09	2.38	0	0	0	0	21,295.09	2.38
Fuel Consumption	1,659.25	0.01	0	0	0	0	1,659.25	0.01
Peat Oxidation	65,869.44	0.23	0	0	0	0	65,869.44	0.23
Sink								
Crop Sequestration	-83,783.39	-0.29	0	0	0	0	-83,783.39	-0.29
Conservation Sequestration	-834.47	0	0	0	0	0	-834.47	0
Total	105,835.80	0.36	0	0	0	0	105,835.80	0.36

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6,470.40	0.02
Fuel Consumption	319.92	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	-5,092.33	-0.02
Sales of PKS	-3,297.54	-0.01
Sales of EFB	0	0
Total	-1,599.54	-0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	12
Divert to methane captured (energy generation) (%)	88

Appendix C: Location Map of Certification Unit and Supply bases

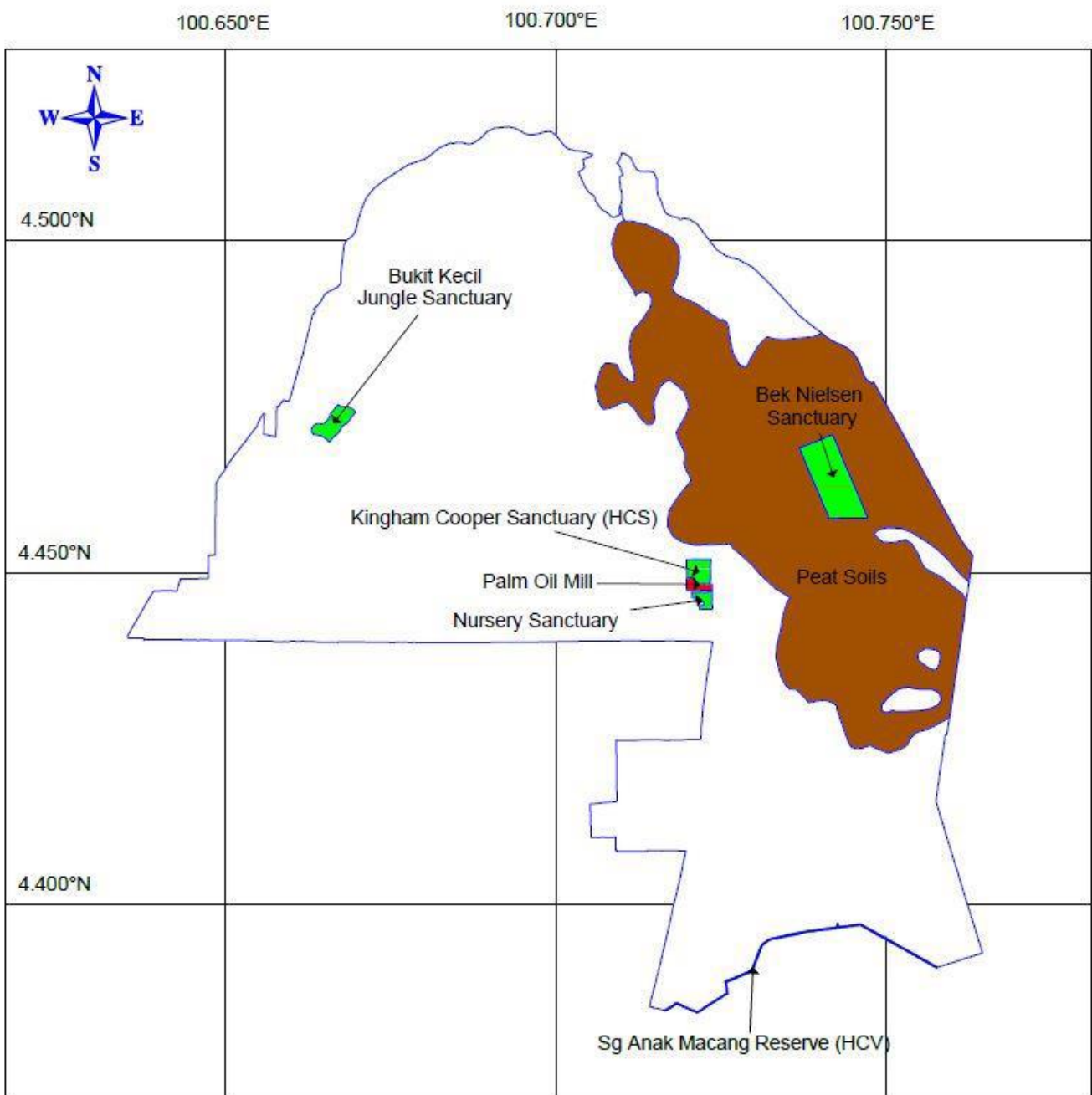


Appendix D: Estate Field Map

UIE Estate



United Plantations Berhad
UIE Estates



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
					Total				

Note: * are smallholders sampled in this audit.

Appendix F: List of Abbreviations

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