



2024

RSPO PRINCIPLES & CRITERIA (PUBLIC SUMMARY REPORT)



ANNUAL SURVEILLANCE AUDIT 2-2

Malaysia

ULU BERNAM OPTIMILL
(United Plantations Berhad)

24th – 28th June 2024

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(RSPO)



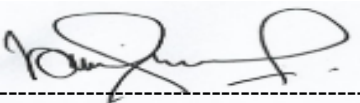
RSPO Membership number	:	8-0196-17-000-00
Member since	:	30th May 2017
Country	:	Malaysia
Affiliate membership	:	http://www.rspo.org/en/member/6445
GGC accreditation certificate number	:	ASI-088
Date of Accreditation	:	18/02/2019



Audit Process Steps

Audit Planning completed	07/06/2024
Field audit completed	28/06/2024
Draft report completed	08/07/2024
Final report completed	12/07/2024
Report sent to Certifier	08/07/2024
Report sent to External Peer Reviewer	N/A
Certification Decision	16/07/2024
First Certification Decision	29/09/2012

Prepared & Signed by Lead Auditor



Name: Ismadi bin Ismail

Position: GGC Lead Auditor

Date: 12/07/2024



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1.0 Executive Summary

1.1 Objective, Audit Methodology, Certification Scope and Recommendation

Objective of Certification Assessment

UPB is one of the larger medium-sized plantation groups in Malaysia, built on a foundation of sustainable agriculture and ethical business practices. As for the oil palm plantations, there are 9 estates in Malaysia and 2 in Indonesia. This gives a total landbank of 46,227Ha of Oil Palm.

Gateway Certifications Sdn. Bhd. [hereafter known as GGC] has conducted the Annual Certification Audit (ASA 2-2) of UPB, Ulu Bernam Optimill Complex (UPBUBO). During this ASA 22, based on the FFB database and stakeholder list, found the mill receives FFB from UPB own estates that are RSPO certified. The source of FFB supplies to Ulu Bernam Optimill are from Ulu Bernam Estate, Charong Estate, Changkat Mentri Estate and Lima Blas Estate.

This assessment was conducted onsite from 24th – 28th June 2024 by 4 auditors to assess the compliance of the certification unit against the RSPO P&C Certification Systems 2020, the RSPO Principles and Criteria 2018 – Malaysia National Interpretation (MYNI Nov 2019). During this audit, interviewed with mill and estate's managers, field staff, estate, and mill workers (local and foreigners) reveals no issue of concerning oil palm processing or cultivation violating any environmental, social nor applicable legal regulations.

Audit Methodology

The methodology for collecting of objective evidence included physical site inspections, observation of tasks and processes, interviews of stakeholders, officers, review of documentation and data. Checklists and questionnaires were used to guide the collection of information and the comments made by external stakeholders were also considered in the assessment.

Among the evidences sought to confirm the ongoing compliance of RSPO are includes of visiting chemical / pesticide / lubricant / schedule waste stores, estate's and mill's operation activities such as manuring / spraying / harvesting / FFB processing / POME, observation of replanting and riparian areas, estate's and mill's best practices, control measures for legal, social, environment and OSH practices, worker's social benefits such as worker's quarters and domestic waste managements. Details of the actual assessment programme are given in Annex 1 – Audit Agenda.

Certification Scope Methodology

The approach to the audit was to treat the UPB, Ulu Bernam Optimill Palm Oil Mill and its supply base as a RSPO Certification Unit. The assessment focused on compliance to legal requirements on the land title, land use rights, trainings on good agriculture practices, awareness towards environmental and conservation value management, waste management & disposal and plantation activities such as fertilising, chemical spraying and harvesting.

Details of the actual assessment programme are given in Appendix A (Audit Plan). Internal and external stakeholders were consulted randomly during the assessment to get their feedback on the estate and POM management's compliance and performance. The assessment was conducted based on sampling approach as specified in RSPO Certification Requirement.



There are 4 (Four) supply bases supplying FFB to UPBUBO, therefore sampling of supply base is not applicable as at minimum all 4 sites to be audited. The audit team has also verified via produced documents and records, found no traces of any issues involving excessive overtime, retention of worker's identity documents, physical and sexual violence, deception, debt bondage, abuse of vulnerability, abuse of working and living conditions, restriction of movement, withholding wages, isolation, and intimidation & treats

Recommendation

The company has established Sustainability Manual for policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of Ulu Bernam Optimill Complex. Estate Senior Manager, Managers and Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual.

The management is committed to comply with RSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of RSPO. There was no complaint or feedback received during this surveillance audit conducted.

This report will be internally reviewed prior to certification decision by GGC. During this Annual Surveillance Audit 22, 0 (zero) major, 0 (zero) minor and 0 (zero) AOC has been raised to the facilities that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and no any outstanding issue, therefore, the lead auditor recommends to continue the certificate of compliance RSPO P&C to UPB Ulu Bernam Optimill Complex.

1.2 Company details and Contact information

Company Name	United Plantations Berhad Membership - 1-0004-04-000-00 Category – Ordinary /Sector - Oil Palm Growers
Business Address	Jendarata Estate, 36009 Teluk Intan, Perak Darul Ridzuan, Malaysia.
Contact Person	Mr. Lee Kian Wei
Office Telephone	05 – 643 6271
E-Mail	lkw@unitedplantations.com



1.3 Certification Units

No	Name Of The Mill	Site Address	Mill's Capacity (MT/HR)	Supply Chain Model	GPS Reference of the site office	
					Longitude	Latitude
1.	Ulu Bernam Optimill	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	60	IP	E 101° 13' 14"	N 3° 49' 19"

No.	Name of the supply base(s)	Site Address	Age Profile	GPS Reference of the site office	
				Longitude	Latitude
1.	Ulu Bernam Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	2002, 2003, 2004, 2005, 2006, 2007, 2009, 2012, 2014, 2015, 2016, 2017, 2018, 2019, 2022, 2024	E 101° 08' 56"	N 3° 44' 46"
2.	Charong Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2013, 2014, 2016, 2017, 2023	E 101° 13' 18"	N 3° 48' 13"
3.	Changkat Mentri Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	1996, 1998, 1999, 2000, 2001, 2002, 2004, 2008, 2009, 2013, 2014, 2018, 2019, 2020, 2022, 2023	E 101° 14' 24"	N 3° 45' 30"
4.	Lima Blas Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	1994, 1995, 1996, 1998, 2000, 2002, 2005, 2006, 2007, 2009, 2012, 2013, 2014, 2015, 2018	E 101° 21' 06"	N 3° 47' 32"



1.4 Production Area, Actual and Projected FFB Production (MT)

No.	Name of the supply base(s)	Area Summary (HA)		
		Land Title	Planted	Mature
1.	Ulu Bernam Estate	3,197.59	3,050.29	3,006.97
2.	Charong Estate	6,901.49	6,747.59	6,116.29
3.	Changkat Mentri Estate	2,550.53	2,363.50	2,159.40
4.	Lima Blas Estate	2,891.89	2,745.00	2,625.47
Total		15,541.50	14,906.38	13,908.13

No.	Name of the supply base (s)	Area Summary (HA)		
		Conservation Area	HCV	Others
1.	Ulu Bernam Estate	0	13.65	133.65
2.	Charong Estate	0	0	153.90
3.	Changkat Mentri Estate	13.22	0.04	173.77
4.	Lima Blas Estate	99.00	0	47.89
Total		112.22	13.69	509.21

No.	Name of the supply base(s)	FFB Summary (MT)		
		Projected from last audit [October 2023-September 2024]	Actual Production for 12 Months [May 2023-April 2024]	Projected Production for next 12 Months [October 2024-September 2025]
1.	Ulu Bernam Estate	88,000.00	93,028.86	90,000.00
2.	Charong Estate	225,000.00	196,189.28	220,000.00
3.	Changkat Mentri Estate	50,000.00	57,894.47	52,000.00
4.	Lima Blas Estate	90,000.00	82,053.66	87,000.00
Total		453,000.00	429,166.27	449,000.00



	Projected from last audit [October 2023-September 2024]	Actual Production for 12 Months [May 2023-April 2024]	Projected Production for next 12 Months [October 2024-September 2025]
FFB Summary (MT)	480,000.00	451,881.59	480,000.00
CSPO Summary (MT)	112,000.00	97,241.00	112,000.00
CSPK Summary (MT)	27,000.00	20,138.53	27,000.00

**Additional 22,715.32 Mt FFB diverted from Ulu Basir Estate (RSPO certificate under Ulu Basir POM). Furthermore, additional 31,000 Mt projected FFB for next 12 months is on FFB diverted from Ulu Basir Estate.*

1.4.1 Certified CSPO & CSPK Data:

For 12 months' period [May 2023- April 2024]	CSPO		CSPK
Last licence year's certified produced	97,241.00		20,138.53
Last licence year's actual sold volume	IP	89,004.32	18,498.05
	MB	-	-
Last licence year's actual sold CSPO credits (where applicable)	-		

1.4.2 Non-certified CPO & PK Data:

Note: This section only for RSPO CSPO & CSPK produced but sold as others scheme

For 12 months' period [May 2023- April 2024]	CSPO	CSPK
Last licence year's actual sold volume	0	0

1.4.3 Non-certified CPO & PK Data:

Note: This section only for RSPO CSPO & CSPK produced but sold as non-certified

For 12 months' period [May 2023- April 2024]	CSPO	CSPK
Last licence year's actual sold volume	0	0



Non-Certified FFB Supplier (Excluded from Certificate)

Name Of The Supply Base	Site Address	FFB Summary (MT)
NIL	NIL	NIL
TOTAL		NIL

*No external FFB supplier.

Scheme Smallholders/Scheme Outgrowers/Independent Smallholders/Outgrowers included in the certificate

☒ This section is not applicable

Type	Presence	Number
Scheme Smallholders	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Scheme Outgrowers	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Independent Smallholders	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Independent Outgrowers	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Details of Scheme Smallholders related to certification

Name	Location	GPS reference		Area Summary (Ha)		Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
TOTAL							

Details of Scheme Outgrowers related to certification

Name	Location	GPS reference		Area Summary (Ha)		Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
TOTAL							

Details of Independent Smallholders related to certification

Name	Location	GPS reference		Area Summary (Ha)		Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
TOTAL							

Details of Independent Outgrowers related to certification

Name	Location	GPS reference		Area Summary (Ha)		Estimated FFB/Year (MT)	Planting Years
	Address	Longitude	Latitude	Total	Mature		
TOTAL							



1.5 Progress of associated Smallholders or Out-growers, if applicable to this assessment

Progress of associated Smallholders or Out-growers towards Compliance with relevant Standards - the mill shall develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years of the mill's initial certification.

****In monitoring compliance with this timeline, an observation shall be raised after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.**

Previous land users, if applicable to this assessment

Section	Requirement	Yes/No	If "Yes"	If "No"	Findings
1.5.1	Are there any areas which were previously owned by other users and/or are subject to customary rights of local communities and indigenous peoples?		Go to 1.5.2	Section 1.5 is N/A	The mill boundary is demarcated by fencing along the boundary with oil palm estate (Ulu Bernam Estate).
1.5.2	Are list of previous land owners and contact details available?		Please fill up table below	-	Not Applicable
1.5.3	Were all the acquisitions done with a proper FPIC?		-	-	Not Applicable
1.5.4	Are there any acquisition agreements available?		-	-	Not Applicable
1.5.5	Were the acquisition agreements complied with?		-	-	Not Applicable

List of previous land owners

OPP	Name	Year of acquisition	Contact details
NIL	NIL	NIL	NIL

Remark: Land ownership by United Plantation since year 1906.

1.6 Outsourced Activities / Contractors

The outsourced activities or contractors are third parties activities that fall inside the scope of certification.

Contractor Name	Type of Outsourced Activity	Location of Activity
VVM Resources	Hire of Excavator	Ulu Bernam Estate
Muthurakku Enterprise	Rubbish collection & disposal	
Shelvaam Enterprise	Transport of FFB	
Nagapan a/l Vijayaraman	Felling, shredding and stacking oil palms in field 24	Lima Blas Estate
Syarikat Pengangkutan Agency dan Perniagaan Sri Kawan,	Transporting FFB to Changkat Mentri Ramp.	
Honey Kanee Transfarmer Sdn Bhd	To construct mounding at low lying areas	

Sakthy Transport Sdn Bhd	Transporting CPO	Ulu Bernam Optimill
Sri Naresh Agency	Transporting CPO	
Excellent Insight Sdn Bhd	Transporting CPO	
Muniandy a/l Varathan	Hire of Excavator	Charong Estate
Xing Lai Enterprise	Hire of Excavator	Changkat Mentri

1.7 Calculation of the Number of Production Units (N) to Sample for the Mill

Where sampling is required for a certification assessment, the sampling design shall include every mill and be based on a minimum sample of x estates, where $x = (0.8\sqrt{y}) \times (z)$, where y is the number of estates and where z is the multiplier defined by the risk assessment. A 'risk level' shall be set at:

Level 1 - low risk (multiplier of 1)

Level 2 - medium risk (multiplier of 1.2)

Level 3 - high risk (multiplier of 1.4)

The result always to be rounded "up" to the next whole integer. Sampling will be done where there are more than four estates or associated smallholders, otherwise all estates must be visited as part of the assessment.

Owned estates (Y)	$N = (\sqrt{Y}) \times (z)$	Smallholders/outgrowers (S)	$N = (\sqrt{S}) \times (z)$
4	Sampling not applicable	NA	NA

Sampling Matrix Ulu Bernam Optimill Complex (Cycle 2: 2022 - 2026)

Year			2022	2023	2024	2025	2026
No.	Estate	Address	RECERT 02	ASA21	ASA22	ASA23	ASA24
1.	Ulu Bernam Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	/	/	/		
2.	Charong Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	/	/	/		
3.	Changkat Mentri Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	/	/	/		
4.	Lima Blas Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	/	/	/		

"/" = Selected supply bases



1.8 Certification Details

Certification body	Global Gateway Certifications Sdn. Bhd., No. 10 Jalan Rasmi 7, Taman Rasmi Jaya, 68000 Ampang, Selangor Darul Ehsan, Malaysia. Tel.: +603 4256 2689; Fax: +603 4256 2687 - www.ggc.my
Assessment standard	<ul style="list-style-type: none"> • RSPO Principles and Criteria Standard – 2018 • Malaysia National Interpretation (MYNI) 2019 of the RSPO Principles and Criteria 2018 for sustainable palm oil production • RSPO P&C Certification Systems 2020
Certificate number	GGC-UPBUBO-RSPO-AA1-2019
Start date certificate	29 th September 2022
Expiration date certificate	28 th September 2027
Date of first RSPO certification	29 th September 2012
Recertification 2	18 th to 22 nd July 2022
Annual Surveillance 21 [ASA 21]	12 th to 16 th June 2023
Annual Surveillance 22 [ASA 22]	24 th to 28 th June 2024
Annual Surveillance 23 [ASA 23]	July 2025 – September 2025
Annual Surveillance 24 [ASA 24]	July 2026 – September 2026



2.0 Assessment Process

2.1 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: Ismadi bin Ismail [IBI]

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. He has dedicated 30 years of his life to the palm oil and rubber plantation industry with wealth of experience spanning in Plantation Management which consist of Plantation Operational and Human Resource.

He is knowledgeable and has vast experiences in peat and mineral soil from jungle clearing until end of traceability process at Palm Oil Mill. Furthermore, his contribution goes beyond the field, as he possesses a profound understanding of recruitment and monitoring of plantation manpower, ensuring the workforce is both skilled and efficient. He established and spearheaded the Foreign Labour Department on recruiting foreign workers from source country such as Indonesia, Nepal, India and Bangladesh.

He had been involved in auditing since 2017 and fully trained and qualified as Lead Auditor/Auditor in CoP, MSPO, RSPO, SCCS and OSHAS. He completed the MSPO Auditor course in 2017 and SCCS in 2019 held by SGS (M) Sdn Bhd, MSPO MS2530:2022 Lead Auditor by MAA Training Academy PLT in 2024, Endorsed RSPO P&C Lead Auditor Course in 2019 and RSPO Refresher in 2024 by CheckMark Training and ISO 9001:2015 Lead Auditor course by TOMC. He is well experience auditing MSPO and RSPO entire Malaysia and Solomon Island.

Apart from auditing, he is also certified MSPO and RSPO Peer Reviewer. Member of GGC MSPO and RSPO audit team. He is able to speak Bahasa Malaysia and English.

During this assessment, he assessed on the aspect of Economic, Social, Legal, GHG Verification and Stakeholder Consultation.

Auditor 1

Name: Baskaran a/I Sankaran [BS]

Master of Occupational Safety & Health Risk Management from Open University Malaysia, Diploma in Mechanical Engineering and Management Programme. More than 20 years of working experience in various industries. Involved in RSPO assessment since 2014. Involved in audits conducted in for many different companies in Malaysia and Indonesia. Completed ISO 9001:2008 and ISO 14001:2004 lead auditor course in 2006 & 2010. Also completed RSPO Lead Auditor training in December 2014. Qualified as Lead Auditor/Auditor in several certification programme such as RSPO, MSPO, ISO and etc. Member of GGC RSPO audit team. Able to speak and understand Bahasa Malaysia, English and Bahasa Indonesia.

During this assessment, he assessed on the aspect of Social, Workers Welfare and Stakeholders Consultation.

Auditor 2

Name: Omar Arbain bin Mohd Supir [OAS]

Bachelor of Science (Hons) (Plantation Technology and Management) First Class with more than 7 years working experience in plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Experienced in handling mineral oil palm estate. Knowledgeable in chemical in control of weeds and pest & disease in Oil Palm Plantation sector. Also, in charge estate workers (local and foreign) and estate work programme. Completed and certified on MSPO Auditor course (MPOCC Endorsed) in 2019 held by SGS (Malaysia) Sdn Bhd and successfully completed ISO 9001:2015 & 14001:2015 by Platinum Shauffmantz Veritas. Member of GGC MSPO and RSPO audit team. Able to speak and understand Bahasa Malaysia and English. During this assessment, he assessed on the aspect of Basic Practices, Environmental and Fields verification.

Auditor 3

Name: Nur Zafirah binti Zulkifli [NZZ]

Graduated in Masters of Science -Environmental Technology and Bachelor of Applied Science (Agro Technopreneurship) with Honours with working experience more than 4 years in environmental mangement and science sector. Also, have 3 years' experience as an auditor for MSPO scheme.

Fully trained in palm oil certification programs such as MSPO, SCCS and etc. Qualified as Auditor in several certification programme. Involved in MSPO assessment since 2019.

Completed and attended Malaysian Sustainable Palm Oil (MSPO) 2530:2013 Auditors Training, MSPO SCCS Auditor Training and ISO 9001:2015 & 14001:2015 Auditor/Lead Auditor Training Course, Integrated Management System. Member of GGC RSPO audit team. Able to speak and understand Bahasa Malaysia and English.

During this assessment, she assessed on the aspect of Best Practices, Supply Chain Oil Mill and Site verification on buildings and amenities.

Local Expert / Observers (If applicable)

Name: NIL

Peer Reviewer (If applicable)

Name: NIL



2.2 Stakeholder Consultation

During this annual surveillance audit (ASA 2-2), the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the RSPO requirements. The meeting was conducted without the present of mill and estate management.

At the start of meeting, the auditor explained the purpose of the audit followed by an evaluation of the relationship between the stakeholders before discussions continued. The auditor recorded comments made by stakeholders and verified with the mill and estate management before incorporating them into the assessment findings. There was no complaint or negative feedback received during this assessment through interviews.

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Hospital Assistant	<ul style="list-style-type: none"> Have a very good understanding on RSPO. No malaria, dengue or influenzas cases were reported. Linesite inspection is done once a week. A record for clinical waste was done and implemented in the clinic. Medical surveillance being examined despite not recommended by CHRA. 	No action requires	Positive findings
2.	General workers	<ul style="list-style-type: none"> Good understanding of RSPO. They have good understanding about complaint and grievance mechanism. They claimed that the management provides good living quarters. PPE was provided by the management. 	No action requires	Positive findings
3.	Security Personnel	<ul style="list-style-type: none"> 20 years of Service in the Estate as Security Personnel. Good understanding about RSPO and Policies. No negative social issue at Estate among local and foreign workers. 	No action requires	Positive findings

		<ul style="list-style-type: none"> Having good relationship with Local Police Station and neighbouring village. 		
4.	Estate Workers - Sprayers	<ul style="list-style-type: none"> They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs. Good understanding about RSPO. They have good understanding about complaint and grievance mechanism. They holds their passport unless for permit renewal. Housing facilities are satisfactory. 	No action requires	Positive findings
5.	Estate Workers - Harvester	<ul style="list-style-type: none"> They have good understanding about RSPO. They have good understanding about complaint and grievance mechanism. PPE given by company – free. They were treated equally with no discrimination based on gender. They confirmed wages are being paid more than the Minimum Wage Order 2022 per month and understand all the deductions being made if any. They holds their passport unless for permit renewal. Housing facilities are satisfactory. 	No action requires	Positive findings
6.	Estate Contractor	<ul style="list-style-type: none"> Good understanding about RSPO. They are very happy with the management and hopes to extend their contract. They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work. They were aware that any complaints or suggestions could 	No action requires	Positive findings



		be forwarded to the estate management.		
7.	Women Committee	<ul style="list-style-type: none"> No sexual harassment has been reported. No social issue from estate workers. 	No action requires	Positive findings
8.	Harvesting Mandore	<ul style="list-style-type: none"> Mandore has attended First Aid training. He does bring first aid box in the field. Good understanding about RSPO. They have good understanding about complaint and grievance mechanism. 	No action requires	Positive findings
9	Locomotive Driver	<ul style="list-style-type: none"> Good understanding about RSPO and Policies. They hold their passport unless for permit renewal. PPE given by company – free. They signed the Contract Agreement upon arrival Salary via Bank Simpanan Nasional. No recruitment fees and recruited through G-to-G programme. 	No action requires	Positive findings
10	Estate School Bus Driver	<ul style="list-style-type: none"> Good understanding about RSPO. They have good understanding about complaint and grievance mechanism. Payment being paid in timely manner by Company via bank. Will assist Estate Workshop if no school activities. Working more than 20 years in the Estate. 	No action requires	Positive findings



2.3 Minimum Requirements for Multiple Management Units

Organizations that have multiple management units, and/or a majority holding in and/or management control of more than one autonomous company growing oil palm, will be permitted to certify individual management units and/or subsidiary companies under certain conditions. A majority shareholding is defined as the largest shareholding; where the largest shareholdings are equal (e.g. 50/50) this applies to the organization that has management control. This process is permitted only if all of the following are complied with.

RSPO Certifications Systems Requirements The parent organization or one of its majority owned and / or managed subsidiaries is member of RSPO.

Summary Membership - 1-0004-04-000-00
 Category – Ordinary /Sector - Oil Palm Growers
 Country - Malaysia
 Member since – 20 July 2004
 Web - www.unitedplantations.com

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

RSPO Certifications Systems Requirements For groups with complex management structures the following are required:
 (a) A statement of the ultimate controlling shareholders and directors in the managing agency company/companies.
 (b) Ditto in respect of each of the operating groups.
 (c) Application for membership by the top asset owning company/companies.
 (d) Application for membership by the managing agency company/companies

Summary This is not applicable since United Plantations Berhad is single group and all the operating units are using the same RSPO membership number.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

If one of the above mentioned requirements is non-compliant, this leads to a major non-conformity. The following requirements about a time bound plan (3.2) and requirements for uncertified management units and/ or holdings (3.3) are applicable if the registered RSPO member is the holding company or one of its subsidiaries and if one or more of these units are currently not yet RSPO P&C certified.



Requirements for time-bound plan

RSPO Certifications Systems Requirements Time-bound plan for certifying all its management units and/or entities, including the units where the organization has management control and no or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan should contain a current list of all estates and mills.

Summary United Plantations Bhd (UPB) has provided the revision of Time Bound Plan (TBP) per May 2023 as seen on "Table of Time Bound Plan for United Plantations Bhd" below. It has covered/stated all management units and/or entities including the units where the organisation has management control for oil palm sector in Malaysia & Indonesia countries refer to UP annual report year 2023.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements As a minimum, all estates and mills shall be certified within five years after obtaining RSPO membership. Any new acquisitions shall be certified within a three year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.

Summary UPB have obtaining RSPO membership since 20 July 2004 and there are 4 POMs and its supply bases in Malaysia have obtaining RSPO certificate on year 2008 except Tanarata estate because it is newly acquired by UPB in year 2019. Tanarata estate have RSPO certified on year 2022. Based on condition above that UPB has complied to RSPO P&C Certification System.

Whereas, Unit of Certification on behalf PT Surya Sawit Sejati (PT SSS) in Indonesia have successfully obtained RSPO certificate in November 2018 and November 2019 (scope extension) but there are part of PT SSS areas (Lada estate and Runtu estate) and scheme of smallholders from PT SSS (lada estate) still uncertified till year 2024. UPB has changed plan year for certification from year 2023 to year 2025 and it have obtaining approval from RSPO secretariat about the proposed new timeline for certification under UPB (part of PT SSS areas and its scheme of smallholders) dated on 26 May 2023.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements What is the progress of this plan since the last audit? (if the last audit was done by another CB, the time-bound plan shall be accepted at the moment of first acceptance and only check continued appropriateness shall be checked).

Summary The Certification Body (CB) conducting the surveillance audit on year 2024 is different from the CB that first accepted the TBP so that the current CB has only checked continued appropriateness. The current CB has verified progress toward new TBP that part of PT SSS areas and scheme of smallholders from PT SSS still uncertified till year 2024 but it is not deviation from proposed new timeline for certification i.e year 2025.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable



RSPO Certifications Systems Requirements	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed? Changes to the time bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);
Summary	<p>No any change of TBP in the current audit (year 2024) but any change of TBP on previous audit (year 2023). The justification on change of TBP for the current audit as belows :</p> <ul style="list-style-type: none"> • Still recovery period after Covid-19 • In progress on the issuance of land titles. The detail of informations as belows : <ul style="list-style-type: none"> ○ HPK Lada estate : still in-process for getting the release of conversion production forest areas permit from Ministry of Environment & Forestry. The current condition that Ministry of Environment & Forestry (c.q. Directorate General of Forest Planning and Environmenral Governance) has issued letter of assignment dated on 5 March 2024 for integrated team to conduct research by desk analysis and they has presented/exposed the result of desk analysis by online on 30 May 2024. ○ APL Lada & Runtu estate : Panita B has carried out meeting and inspection to field on 5 June 2024 ○ Scheme smallholder areas : land ownership title (SHM) has issued with total of 634 Ha whereas the remain of scheme smallholder areas still in-process. <p>Whereas, some requirements relate of the issuance of land titles has fulfilled by UPB if comparing with previous audit condition i.e :</p> <ul style="list-style-type: none"> • Hak Pakai for conservation areas in Lada estate and scheme smallholder areas has issued degree letter dated on 07 March 2023 from National Land Agency and Hak Pakai certificate has issued dated on November 2023. • HGB (Building title) for building in Runtu estate & scheme smallholder : it has issued dated on 29 January 2021 <p>UPB has demonstrated some evidences to supporting justification above .</p>
<p>In Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p>	

RSPO Certifications Systems Requirements	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;
Summary	<p>CB has not found isolated lapses in implementation or fundamental failure to proceed with implementation of the plan.</p>
<p>In Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p>	



Requirements for uncertified management units and/or holdings

RSPO Certifications Systems Requirements

a) No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since January 1st 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified

Summary

The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has submitted RaCP proposal and successfully obtained the approval on 4th October 2019.

In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder.

The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements

(b) Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6; RSPO-PRO-T01-002 V2.0 ENG 24 of 42

Summary

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.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements

(c) Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;



Summary

Procedure for calculating and distributing fair compensation has been in place in the similar document Procedure for calculating and distributing fair compensation has been in place in the similar document of SOP land compensation No. HRD-015-R00 dated 1st 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.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements

(d) Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;

Summary

Personnel in charge to manage the legal documentation system are Legal Department (Led by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up through procedure No: SOP-HRD-017-R00.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements

(e) CBs shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the CB based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:

Summary

PT. Surya Sawit Sejati has conducted annual RSPO internal audits periodically. The latest internal audit was carried out on 12 February to 15 March 2024. The positive assurance statement is made available in the internal audit report that the business units are in compliance with RSPO P&C.

CB will carried out the stakeholders consultation to the uncertified units with the relevant NGOs comment. As per period of audit, there is not complaint to area of uncertified units. Verify with the RSPO website and also UP Berhad website.

No further stakeholders consultation conducted for uncertified units. CB will carried out the stakeholders meeting/site visit if there is non compliance with the requirements at uncertified units.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

RSPO Certifications Systems Requirements

(f) A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by the organization. This would require evidence of the self-assessment against each requirement;



Summary Based on description 5.5.3 (a)-(d) above that all requirements are compliance status.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

RSPO Certifications Systems Requirements (g) Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the CB;

Summary Based on description 5.5.3 (f) above that no any non-compliance so certificate of the certified unit still active

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

RSPO Certifications Systems Requirements (h) Desktop study e.g. web check on relevant complaints.

Summary As per period of audit, there is no complaint to area of uncertified units. Verify with the RSPO website and also UP Berhad website. .

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

RSPO Certifications Systems Requirements (i) If necessary, the CB may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements;

Summary No further stakeholders consultation conducted for uncertified units. CB will carried out the stakeholders meeting/site visit if there is non compliance with the requirements at uncertified units.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

RSPO Certifications Systems Requirements (j) For requirements 4.5.4 (a)-(d) above, the definition of major and minor non-compliance is stated in the RSPO P&C. For example, if a non-compliance against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;

Summary If there is major/minor non compliance with the uncertified units stated in RSPO P&C, the current certification assessment may received pr can not proceed to successful conclusion.



In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

**RSPO
Certifications
Systems
Requirements**

(k) Failure to address any outstanding non-compliances within uncertified unit(s) regarding 4.5.4 (a) – (d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

Summary No outstanding non-compliances within uncertified management unit regarding 4.5.4 (a) – (d).

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

**RSPO
Certifications
Systems
Requirements
(4.6.3)**

Relevant stakeholders include but not limited to statutory bodies, indigenous peoples, local communities (including women representatives, displaced communities), workers and workers' organizations (including migrant workers), smallholders, and local and national NGOs.

Summary No further stakeholders consultation conducted for uncertified units. CB will carried out the stakeholders meeting/site visit if there is non compliance with the requirements at uncertified units.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

**RSPO Certifications
Systems
Requirements(4.6.4)**

Oil palm operations have been established in areas which were previously owned by other users and/or are subject to customary rights of local communities and indigenous peoples?

All of these parties of Oil Palm operations have been established in areas which were previously owned by other users and/or are subject to customary rights of local communities and indigenous peoples to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.

Summary No disputes have been recorded in mill and estate area. There is no evidence of conflict present in this complex. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

**CBs shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements above by the CB based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable.



Time Bound Plan for United Plantations Bhd

Time Bound Plan				
Palm Oil Mill	Country	Supply Bases (estates, plantations, associations)	Targeted RSPO Certification Year	Current Certification Status as per this Audit
Lada POM PT Surya Sawit Sejati	Kotawaringin Barat District, Central Kalimantan	Lada Estate – 2509.21 ha*	2025	*For the additional area where HGU has been issued on 12th March 2018, we undergo Scope Extension Assessment in 2019 and currently RSPO certified for 6717.62ha. The balance area will be certified in tandem with the issuance of land use certificate by the Indonesian Government.
		Runtu Estate – 6146.80 ha*	2025	
		Plasma Lada, Runtu, Arut, Kumai - 1813.09 ha	2025	
		Conservation of Arut & Kumai – 1260.99 ha	2025	

Summary of the findings for Multiple Management Unit

The audit team assessed compliance with the above requirements during this audit. Failure to address any non-compliance identified may lead to certification suspension.

The rules for partial certification allow organizations that have a majority holding in and / or management control of more than one autonomous company growing oil palm to certify individual management units and / or subsidiary companies subject to certain rules. United Plantation Bhd is a member of RSPO and has been involved in the certification since 19th July 2004. The membership number with RSPO is 1-0004-04-000-00. There are no associated smallholders/outgrowers supplying FFB to the POM in Malaysia. However, for Lada POM, there are associated plasma smallholders (Lada, Runtu, Arut, Kumai) and (4) four unassociated independent FFB suppliers. There are no lapses is found in Multiple Management Unit requirement against United Plantations Berhad. Therefore, no non-conformance was raised.



3.0 Assessment Findings by Principles and Criteria

Principle 1: Behave ethically and transparently		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
1.1.1 (C)	<p>United Plantations Berhad has established its policy on documents that can be assessed by the External and Internal stakeholders dated 11/01/14 and approved by Dato Carl Bek Nielsen, Chief Executive Officer.</p> <p>Among the listed documents as publicly available are as follows: -</p> <ol style="list-style-type: none"> 1. Land titles/user rights 2. Occupational health and safety plans 3. Plans and impact assessments relating to environment and social impacts 4. HCV documentations 5. Pollution prevention and reduction plans Details of complaints and grievances 6. Continuous improvement plans 7. Public summary of certification assessment report 8. Human Rights Policy <p>As for Non-Publicly Available documents are: -</p> <ol style="list-style-type: none"> 1. All Company's Standard Operating Procedures and Field Management Manuals 2. Guidelines to various operations documents <p>All these documents were sighted in the mill and visited estate offices. Based on the footnote of the policy, any requests for official documents to the mill or estate managers, whom will make the decision as to whether the information can be shared to or viewed by the person requesting the information or document.</p> <p>Based on the Stakeholder Log Book, there is no evidence of any stakeholder(s) requesting on estate's-controlled documents or records.</p>	Yes
1.1.2	<p>Onsite visit at estates' offices, observed the information are displayed at notice boards in appropriate languages especially in Bahasa and English.</p> <p>External stakeholder meeting was done in bilingual (English & Bahasa Malaysia), where the discussed/briefed topics on policies in general as it covers most elements from RSPO requirements. Example, content of HCV, SIA and EIA seen briefed as per the power point slides.</p> <p>Distribution of Employee and Stakeholders Handbook which is written in eight (8) languages namely English, Bahasa Melayu, Bahasa Indonesia, Bengali, Hindi, Tamil, Nepali and Telegu for the Employees and External Stakeholders' understanding. Sighted the said handbook which is kept in the Mill office.</p>	Yes



	As per interview, if there any request for information required for other languages, the management will explain in an appropriate language.																			
1.1.3 (C)	<p>The mill and estate have established a procedure, SOP Stakeholder Engagement, Rev.0 dates 09.04.2021. The procedure stated the response timeline response for internal and external stakeholder records request.</p> <p>For year 2024, the number of Request and Response made by the external stakeholder for both mill and estates are as below: -</p> <table border="1"> <thead> <tr> <th>No</th><th>Estate/ Mill</th><th>No of Request</th></tr> </thead> <tbody> <tr> <td>1</td><td>Ulu Bernam</td><td>11</td></tr> <tr> <td>2</td><td>Lima Blas</td><td>13</td></tr> <tr> <td>3</td><td>Ulu Bernam Optimill</td><td>8</td></tr> <tr> <td>4</td><td>Charong</td><td>0</td></tr> <tr> <td>5</td><td>Changkat Mentri</td><td>4</td></tr> </tbody> </table> <p>Sample taken as follows: -</p> <ol style="list-style-type: none"> 1. Request from Ulu Bernam Police Station to repair ceiling fan at Ketua Polis Balai Ulu Bernam Office dated 8/1/2024. Permission was approved on 9/1/2024. 2. Request by Mr. Kamarudin Sabran, FELDA Gegangsa to use Estate Road for transporting FFB dated 12/1/2024. The application was granted on 16/1/2024. 3. A request from Mr. Saran Samugam dated 21/5/2024 on Permission for Canopy. The permission granted on 4/6/2024. <p>There is evidence that records have been properly maintained and responded to in a timely manner.</p>	No	Estate/ Mill	No of Request	1	Ulu Bernam	11	2	Lima Blas	13	3	Ulu Bernam Optimill	8	4	Charong	0	5	Changkat Mentri	4	Yes
No	Estate/ Mill	No of Request																		
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1.1.4 (C)	<p>United Plantations Berhad maintained the current Internal Grievance Redressal Procedure and External Grievance Redressal Procedure as guideline to handle Consultation and Communication.</p> <p>The Mill and Estates maintained the Stakeholders logbook form as platform to channel stakeholders' request, grievance and complaint. The form been distributed to stakeholders' during annual stakeholders' dialogue session.</p> <p>As per interview with stakeholders, it has been confirmed that that they have been explained and they can demonstrate their understanding on the SOPs. Evidence of communication of the SOPs as follows: -</p> <ol style="list-style-type: none"> 1. Annual Stakeholder dialogue session at Upriver Business Unit was conducted On 25/4/2024 at Ulu Bernam Estate Community Hall lead by Dr. Sanath Kumaran, Deputy Group Manager, HRSS. The meeting attended by 100 participants. 2. Briefing on Company Policies at Ulu Bernam Estate was conducted on 5/3/2024 attended by 200 workers. 	Yes																		



	<p>3. As for Ulu Bernam Optimill, the Policy briefing was conducted on 8,14,20 January 2024 at Mill Muster Ground to 127 workers.</p> <p>4. In Charong Estate, the Policy Briefing being communicated to 478 workers on 6/3/2024 lead by HRSS Team.</p> <p>5. Policy Briefing to 220 Changkat Mentri Estate workers being relay on 20/2/2024 by Mr. Gobinath, Assistant Manager.</p>																			
1.1.5	<p>The mill and estates have established its Stakeholders list with their name, telephone number, contact name, address and others. The list being updated yearly and the recent as follows: -</p> <table border="1"> <thead> <tr> <th>No</th><th>Estate</th><th>Date Updated</th></tr> </thead> <tbody> <tr> <td>1</td><td>Ulu Bernam</td><td>1/1/2024</td></tr> <tr> <td>2</td><td>Lima Blas</td><td>8/4/2024</td></tr> <tr> <td>3</td><td>Ulu Bernam Optimill</td><td>13/2/2024</td></tr> <tr> <td>4</td><td>Charong</td><td>3/1/2024</td></tr> <tr> <td>5</td><td>Changkat Mentri</td><td>15/1/2024</td></tr> </tbody> </table> <p>As evidence, sampled estates and mill has updated their stakeholders list in year 2024 which seen divided into five [5] categories as follow:</p> <ol style="list-style-type: none"> 1) Government Bodies (E.g.: SOSCO, MPOB, JTK, Ministry of Domestic Trade, Co operatives and Consumerism (KPDNKK) etc. 2) Non-Governmental Organization Service Providers (E.g.: All malayan Estates Staff Union (AMESU), Tenaganita, etc. 3) Service Providers/Contractors / Suppliers. (E.g.: Sabak Trac Machine Trading, Visiting Medical Officer, etc) 4) Neighbouring Community / Plantation / Smallholders (E.g.: Felda Besout (FGV), Mr. Thinagaran (smallholders), Kg Orang Asli, Ladang Sg. Erong, etc). 5) Estate Community / Estate Representatives (E.g.:Gender Comiittee, Surau Committee Chairman, etc) 	No	Estate	Date Updated	1	Ulu Bernam	1/1/2024	2	Lima Blas	8/4/2024	3	Ulu Bernam Optimill	13/2/2024	4	Charong	3/1/2024	5	Changkat Mentri	15/1/2024	Yes
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5	Changkat Mentri	15/1/2024																		
1.2.1	<p>United Plantations Berhad maintained the current Code of Conduct and Business Ethics, signed by Dato' Carl Bek-Nielsen, Chief Executive Director dated 14/12/2019. There's also Commitment on United Plantatations's Supplier Code of Conduct to be acknowledged and implemented by service providers/vendors and included as part of the vendors' contract agreements.</p> <p>The above policy is written in eight languages namely English, Bahasa Melayu, Bahasa Indonesia, Bengali, Hindi, Tamil, Nepali and Telegu for the Employees understanding. The above policy has included the following aspect:</p> <ul style="list-style-type: none"> • Fair conduct of business. • A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources. 	Yes																		

	<ul style="list-style-type: none">A proper disclosure of information in accordance with applicable regulations and accepted industry practices. <p>Interviewed with foreign and local workers, reveals no any form of corruption or discrimination by the estate management.</p> <p>The sustainability policies seen display at public notice boards outside of estate office.</p>															
1.2.2	<p>The company has put in place the following mechanism to monitor compliance and the implementation of the policy and overall ethical business practice. The details are as follows.</p> <table><tr><th>Mechanism</th><th>Details</th></tr><tr><td>Sustainability Internal Audits</td><td><ul style="list-style-type: none">Audits on housing facilities and living standardsVerification on the workers' wages, overtime, WDR and other elements in line with Malaysian Employment Act 1955Verification on freedom of association and non-discriminatory practicesCheck on the addendum which comprises the clauses on adherence to Malaysian Anti-Corruption Commission (MACC) Act 2009 (Amendment 2019)</td></tr><tr><td>Registered Office Internal Audits</td><td><ul style="list-style-type: none">Verification on the workers' wages and payment voucher for petty cashVerification on Memorandum of Agreement (MoA) for supplier and contractors</td></tr><tr><td>KPMG Audits</td><td><ul style="list-style-type: none">Access key internal control in Estate and Mill management procurement and payment, checkroll processing, inventory management and fixed asset management</td></tr><tr><td>Ernest & Young Audits</td><td><ul style="list-style-type: none">Verification on the financial statement for Company Annual Report and give a true and fair view of the financial performance in accordance with the accounting standards</td></tr><tr><td>Risk Committee Assessment</td><td><ul style="list-style-type: none">Evaluate the overall risks within the Group, market and relevant stakeholders</td></tr><tr><td>Customer satisfaction survey</td><td><ul style="list-style-type: none">Measure how our finished goods meet our customers' expectationsAnalysis of the products (FFB, CPO, PK) prior to shipment to refineries</td></tr></table> <p>There are no findings related to ethical conduct raised for all the audits assessment.</p>	Mechanism	Details	Sustainability Internal Audits	<ul style="list-style-type: none">Audits on housing facilities and living standardsVerification on the workers' wages, overtime, WDR and other elements in line with Malaysian Employment Act 1955Verification on freedom of association and non-discriminatory practicesCheck on the addendum which comprises the clauses on adherence to Malaysian Anti-Corruption Commission (MACC) Act 2009 (Amendment 2019)	Registered Office Internal Audits	<ul style="list-style-type: none">Verification on the workers' wages and payment voucher for petty cashVerification on Memorandum of Agreement (MoA) for supplier and contractors	KPMG Audits	<ul style="list-style-type: none">Access key internal control in Estate and Mill management procurement and payment, checkroll processing, inventory management and fixed asset management	Ernest & Young Audits	<ul style="list-style-type: none">Verification on the financial statement for Company Annual Report and give a true and fair view of the financial performance in accordance with the accounting standards	Risk Committee Assessment	<ul style="list-style-type: none">Evaluate the overall risks within the Group, market and relevant stakeholders	Customer satisfaction survey	<ul style="list-style-type: none">Measure how our finished goods meet our customers' expectationsAnalysis of the products (FFB, CPO, PK) prior to shipment to refineries	Yes
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Principle 2: Operate legally and respect rights		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
2.1.1 (C)	<p>The Mill and Estate under the Certification Unit continues to comply with all verified legal requirements.</p> <p>The sampled mill and estates had obtained and renewed license and permits as required by the law and documented under Summary of Permit & Licenses for Year 2024. Amongst the licenses/permit verified were:</p> <p>1. Ulu Bernam Optimill</p> <ul style="list-style-type: none"> • Certificate of Authentication HALAL – 15/03/2025 (JAKIM.700-2/3/1 001-02/2004 • D.O.E annual license renewal no.006265 – AS(B) A 31/152/000/059, renewal in process. • Water Abstraction License No. LK/3/22/00642 (Facility Licence - Private Water Supply System and Service License – Water Treatment) Type – Conventional and System Capacity is 0.30 million Liter/day – 1/6/2024 until 31/5/2025 • MPOB license no.: 617006004000, until 30/11/2024 (allowing 450,000MT/year for [buying CPO, FFB, PK, SPO], selling [CPO, FFB, PK], storing CPO, PK, SPO] and processing of FFB • Fire certificate – The mill has an official letter (JBPM/PK/BKK:700-3/1/7/154 dated on from Jabatan Bomba & Penyelamat Malaysia, Perak stating the Optimill no longer required to obtain Fire Certificate as the facility not falls under the requirement of Fire Service Act 1988 (Act 341) and The Fire Service (Fixed Premises) (Amendment) Regulations 2020 [PU(A) 289] • Boat License, LC ATA 2024/69955 valid until 6/5/2025 • Sodium Hydroxide in accordance to Form A Poison Ordinance 1952, Permit to Purchase, Store and Use, No 011021 Liquid – 80000 valid until 31/12/2024 • Diesel storage permit, PBKB/2023/P/A-000239 for 11,000 Litters Diesel and 10,000 litters Petrol – valid until 2/12/2025 • Competence person as Seafarer – No 016752 Grade – Mate of less than 500GT Domestic Trade Voyages (Restricted) • Competence person as Seafarer – No 016753 Grade – Mate of less than 500GT Domestic Trade Voyages (Restricted) • Competence person for Schedule Waste Management – CePSWaM/01295 (Nik Jazrikel Bin Johannis) 	Yes



	<ul style="list-style-type: none"> Competence person for Effluent Pond Management – The Mill Engineer CePPOME/220540 expiring 26/03/2025 Steam Engineer Grade 1, No 157/2016, Peraturan (Perakuan Kebolehan Peperiksaan) Kilang dan Jentera, 1970 – Perakuan Kebolehan , Peraturan 5(2) Steam Engineer Grade 2, No 090Driver Engine/2014, Peraturan (Perakuan Kebolehan Peperiksaan) Kilang dan Jentera, 1970 – Perakuan Kebolehan , Peraturan 5(2) Steam Driver Engine, Grade 1 – Mr. Barathan a/l Muthu Authorized Entrant and Standby Person for Confined Space – Bharathan a/l Muthu, Prabagar a/l Paranthaman and Anbananthan a/l Sinnasamy valid until March 2026 Crane, Gas Engines – PK PMA 6649 expiring on 10/04/2025 Crane, Reception Station – PK PMA 81009 expiring on 10/04/2025 Crane, Press Station – PK PMA 81008 expiring on 10/04/2025 Crane, Empty Bunch Station – PK PMA 81638 expiring on 10/04/2025 Sterilizer 1 – PK PMT 80813 expiring on 10/04/2025 Sterilizer 2 – PK PMT 80814 expiring on 10/04/2025 Sterilizer 3 – PK PMT 80815 expiring on 10/04/2025 Workshop Air Compressor – PMT 447 - expiring on 10/04/2025 Sterilizer Air Compressor – PK PMT 80811 - expiring on 10/4/2025 Oil Room Air Compressor – PK PMT 80810 - expiring on 10/04/2025 Boiler 1 Air Compressor – PK PMT 81541 - expiring on 10/04/2025 RO Plant Air Compressor – PK PMT 80812 - expiring on 10/04/2025 Boiler 2 Air Compressor – PK PMT 81542 - expiring on 10/04/2025 Power Plant Air Compressor – PK PMT 80812 - expiring on 10/04/2025 Reception Station Air Compressor – PK PMT 3085 - expiring on 10/04/2025 Biogas Plant Air Compressor – PK PMT 81540 - expiring on 10/04/2025 Boiler 1– PK PMD 80392 - expiring on 10/04/2025 Boiler 2– PK PMD 80131 - expiring on 29/6/2024 Thermal Dearator – PK PMT 80900 - expiring on 10/04/2025 Back Pressure Vessel – PK PMT 80901- expiring on 10/04/2025 	
	<p>2. In Ulu Bernam Estate</p> <ul style="list-style-type: none"> MPOB license no.: 501547502000, validity – 31/03/2025 	



	<ul style="list-style-type: none"> • CHRA (JKKP HIE 127/171-2(1)-2017/005 report dated 07/06/2022 which valid for 5 years. • Service Agreement for Clinical Waste Management and Disposal, FNRG/CKH-ltr/029.04/2017 by Sharps and Bins Sdn. Bhd. dated 31/5/2027 • Diesel storage permit, KPDN/BPGK/TIN/PBKB/0039/19 no. A004033 for 39,600 Litters Diesel and 9,000 litters Petrol – valid until 22/07/2024 • Canon Photocopy Machine, 2RU01719 valid until 31/1/2025 • Gun License, HP4034 valid until 30/6/2025 • Air compressor, PMT-PK/24 106384 valid until 19/2/2025 • Private Hospital License – 130807-00305-01/2024 valid until 13/1/2026 • SPAN- Water Service Industry; SPAN/EKS(PT)800-4(1)/15/09, SPAN/EKS(PT)800-4(2)/15/09 valid until 13/3/2025. • License autoclave – PMD-PK/24 106341 valid until 19/5/2025 • License Sungle Girder A-Shape Portal Gantry Crane, PMA-PK/23 99670 valid until 17/12/2024 • Licensed Monorail Crane, PMA-PK/24 106385 valid until 19/5/2025 <p>3. In Lima Blas Estate, sampled:</p> <ul style="list-style-type: none"> • MPOB license no.: 50446110200, valid until – 30/06/2025. • Diesel storage permit, PKPB/2024/P/A-000078 for 13,800 Litters – valid until 6/2/2026 • Petrol storage permit, PKPB/2023/B/A-000483 for 800 Litters – valid until 30/11/2024 • Licence for Firearm – KKB/1359, renewed on 30/6/2024 • CHRA by Hemalatha Tamil Selvan (Dosh Reg. HQ/13/ASS/00/316) valid until 7/6/2027 • Water Abstraction License No. SWAL (P11) 000473 (Facility Licence - Private Water Supply System and Service License – Water Treatment) Type – Conventional and System Capacity is 0.25 million Liter/day – 1/6/2024 until 31/5/2025 • Lesen untuk Mengendalikan atau Menyediakan Kemudahan atau Perkhidmatan Jagaan Kesihatan Swasta, 130807-00305-01/2024 for 20 beds valid until 13/4/2026. <p>4. In Charong Estate</p> <ul style="list-style-type: none"> • MPOB license no.: 619241002000, valid until – 30/04/2025. • Diesel / Petrol storage permit No. PKPB/2023/B/A-000314 for 12,285 Litre of diesel and for 500 Liter of petrol - valid until 08/09/2024 	
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	<ul style="list-style-type: none"> • Weapon license – HP8994 for 2024/2025 • SPAN license no. LK/3/22/00645 valid until 29/06/2025. • Private Hospital License – 130807-00305-01/2020 valid until 13/4/2026 • Gantry crane, monorail – PK PMA 3185 valid until 18/6/2025 • Air tank – PK PMA 7004 valid until 18/6/2025 • Monorail crane, PK PMA 81637 valid until 18/6/2025 <p>5. In Changkat Mentri Estate</p> <ul style="list-style-type: none"> • MPOB license no.: 501897102000, valid until – 31/10/2024 – 3,715.83 hectare • Diesel storage permit no. A004187 for 8,000 Litre of diesel - valid until 19/10/2025 • Water Abstraction License No. LK/3/22/00643 (Facility Licence - Private Water Supply System and Service License – Water Treatment) Type – Conventional and System 26/5/2022 until 25/5/2025 • Permit Kebenaran BERSYARAT menggunakan Bekalan Air Persendirian Seksyen 6(1)(a) Akta Standard Minimum Perumahan, Penginapan dan Kemudahan Pekerja 1990 – Serial Number 2022/0002 valid until 10/2/2024. Application of new permit yet to approved Akta Bekalan Elektrik 1990, Pepasangan No: ST(PIP)P/S/PRK/00988 for 46.75 Kw valid until 13/6/2025 																			
2.1.2	<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. The Legal & Requirements Register (LRR) being updated yearly by Mill and Estate, as below:-</p> <table border="1"> <thead> <tr> <th>No</th><th>Estate/ Mill</th><th>Date Updated</th></tr> </thead> <tbody> <tr> <td>1</td><td>Ulu Bernam</td><td>18/3/2024</td></tr> <tr> <td>2</td><td>Lima Blas</td><td>10/3/2024</td></tr> <tr> <td>3</td><td>Ulu Bernam Optimill</td><td>11/3/2024</td></tr> <tr> <td>4</td><td>Charong Estate</td><td>14/3/2024</td></tr> <tr> <td>5</td><td>Changkat Mentri</td><td>1/3/2024</td></tr> </tbody> </table> <p>A total of 69 local laws and 7 international laws being documented. Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and being evaluated individually from time to time for compliance by the Sustainability Team and/or the Estate and Mill Manager. Tracking changes in law will be updated by HREHS team. There are 3 new laws have been captured in the register as per below: -</p>	No	Estate/ Mill	Date Updated	1	Ulu Bernam	18/3/2024	2	Lima Blas	10/3/2024	3	Ulu Bernam Optimill	11/3/2024	4	Charong Estate	14/3/2024	5	Changkat Mentri	1/3/2024	Yes
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1	Ulu Bernam	18/3/2024																		
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3	Ulu Bernam Optimill	11/3/2024																		
4	Charong Estate	14/3/2024																		
5	Changkat Mentri	1/3/2024																		



	<ol style="list-style-type: none"> 17/1/2024 – Average water tariff rise by 22 sen/cu M in Peninsular, Labuan from 1/2/2024 28/2/2024 – Validation of FOMEMA Foreign Worker Health checks has been set as an annual check in the Malaysian Immigration Department w.e.f 1st February 2024. 3/4/2024 – Occupational Safety and Health (License Person) Order 2024 3/4/2024 - Occupational Safety and Health 9 Plant Requiring Certificate of Fitness) Regulations 2024 14/3/2024 – MAVCOM announces revised rates for Passenger Service Charges effective June 1, 2024 19/6/2024 – Environmental Quality (Amendment) Act 2024 19/6/2024 – Occupational Safety and Health (Construction Work) (Design and Management) Regulations 2024 																																																				
2.1.3	<p>The mill is located within Ulu Bernam Estate. Grand No. 145238, Lot No. 10100 with total hectarge of 2227.3Ha that identifies the mill's location (37Ha in Block 63) with GPS co-ordinates. The mill perimeter was found fenced from illegal entrance by outsiders.</p> <p>According to the land title, there are 9 lots totaling to 3,197.59 Ha with 8 Freehold and 1 T.O.L Land status registered under United Plantations Berhad. Sighted land title for Ulu Bernam Estate as follows: -</p> <table border="1"> <thead> <tr> <th>Lot No</th><th>Title No</th><th>Hectare</th></tr> </thead> <tbody> <tr><td>4593</td><td>48995</td><td>0.10</td></tr> <tr><td>4336</td><td>55013</td><td>3.55</td></tr> <tr><td>4334</td><td>55010</td><td>3.62</td></tr> <tr><td>10100</td><td>145238</td><td>2,227.30</td></tr> <tr><td>4579</td><td>144752</td><td>458.71</td></tr> <tr><td>4576</td><td>122979</td><td>39.22</td></tr> <tr><td>5792</td><td>20704</td><td>24.73</td></tr> <tr><td>6 & 7</td><td>10778</td><td>345.05</td></tr> <tr><td>T.O.L Land</td><td></td><td>95.31</td></tr> <tr><td>Total</td><td></td><td>3,197.59</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Lot No</th><th>Title No</th><th>Hectare</th></tr> </thead> <tbody> <tr><td>4593</td><td>48995</td><td>0.10</td></tr> <tr><td>4336</td><td>55013</td><td>3.55</td></tr> <tr><td>4334</td><td>55010</td><td>3.62</td></tr> <tr><td>10100</td><td>145238</td><td>2,227.30</td></tr> <tr><td>4579</td><td>144752</td><td>458.71</td></tr> </tbody> </table>	Lot No	Title No	Hectare	4593	48995	0.10	4336	55013	3.55	4334	55010	3.62	10100	145238	2,227.30	4579	144752	458.71	4576	122979	39.22	5792	20704	24.73	6 & 7	10778	345.05	T.O.L Land		95.31	Total		3,197.59	Lot No	Title No	Hectare	4593	48995	0.10	4336	55013	3.55	4334	55010	3.62	10100	145238	2,227.30	4579	144752	458.71	Yes
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T.O.L Land		95.31
Total		3,197.59

As for Lima Blas Estate, only 1 freehold lot under title Number: GT(02) 18249 totaling to 2,891.89 Ha registered under United Plantations Berhad. At Charong Estate, 4 lots totaling to 6,038.20 Ha with 8 Freehold and 2 Leasehold status 863.29 hectare registered under United Plantations Berhad. Sighted land title for Charong Estate as follows: -

Lot No	Title No	Hectare
36159	GRN 402202	4,796.70
6873	PN 334559	809.40
14107	PN 273463	53.89
36161	GRN 402204	190.50
8892	GRN 84837	1,051.00
Total		6,901.49

In Changkat Mentri Estate, 3 freeholds lot and 4 Leasehold lots totaling to 2,550.53 Ha registered under United Plantations Berhad. During site visit, observed the boundary poles are clearly identified / visible. Sighted the GPS co-ordinates of 25 points respectively as sample below: -

Point No.	Latitude (N)	Longitude (E)
Ulu Bernam Estate		
1	3°44'49"	101°08'44"
5	3°45'36"	101°11'18" E
18	3°43'09"	101°11'11"
25	3°44'08"	101°08'05" E
Lima Blas Estate		
6	3°46'40"	101°22'57"



		12	3°43'37"	101°22'21" E		
		20	3°46'22"	101°19'48"		
		23	3°47'25"	101°20'21" E		
		Charong Estate				
		9	3°51'53"	101°11'04"		
		14	3°52'20"	101°12'23" E		
		18	3°51'32"	101°14'17"		
		22	3°50'09"	101°14'37" E		
		Changkat Mentri Estate				
		2	3°43'24"	101°12'12"		
		4	3°43'06"	101°12'41" E		
		8	3°42'53"	101°13'36"		
		12	3°43'28"	101°14'26" E		
2.2.1	<p>List of contracted parties is maintained under stakeholder list. All the contractors signed the Memorandum of Agreement with the Estates and Mill. Details as listed below: -</p> <ol style="list-style-type: none"> Ulu Bernam Estate <ul style="list-style-type: none"> VVM Resources – MOA No;06/2024 - Hire of Excavator for Drainage Muthurakku Enterprise – MOA No;02/2024 – Rubbish collection & disposal from staff quarters. Shelvaam Enterprise – MOA No;04/2024 – Hiring of Backhoe <p>All the contracts period is 12 months commencing from 01/01/2024 to 31/12/2024.</p> <ol style="list-style-type: none"> Lima Blas Estate <ul style="list-style-type: none"> Nagapan a/l Vijayaraman – MOA No;3034 – Felling, shreddig and stacking oil palms in field 24. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024. Syarikat Pengangkutan Agency dan Perniagaan Sri Kawan,Transporting FFB to Changkat Mentri Ramp. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2025. 					Yes

	<ul style="list-style-type: none"> Honey Kanee Transfarmer Sdn Bhd, to construct mounding at low lying areas, The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024. <p>3. Ulu Bernam Optimill</p> <ul style="list-style-type: none"> Sakthy Transport Sdn Bhd. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 Sri Naresh Agency. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 Excellent Insight Sdn Bhd. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 <p>4. Charong Estate</p> <ul style="list-style-type: none"> VVM Resources – MOA No;16607/2024 - Hire of Excavator for Drainage. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 Jaisarani Enterprise – MOA No;16612/2024 - Hire of Excavator for Drainage. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 Kirthiga Enterprise – MOA No;16610/2024 - Hire of Excavator for Drainage. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 RK Vijeyabala Enterprise – MOA No;16615/2024 - Hire of Excavator for Drainage. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 Prakas a/l Vala – MOA No;16613/2024 - Hire of Excavator for Drainage. The contracts period is 12 months commencing from 01/01/2024 to 31/12/2024 <p>5. Changkat Mentri Estate</p> <ul style="list-style-type: none"> Xing Lai Enterprise – MOA No;9008 - Hire of Excavator for Drainage. The contracts period is 12 months commencing from 22/01/2024 to 31/12/2024 	
2.2.2	<p>United Plantations Berhad maintained List of contractors and updated on annual basis The contractors Memorandum of Agreement was available for verification for all contracted parties with the mill and estates.</p> <p>The contractor shall adhere to the current Applicable Laws and Regulation Include Environmental Quality Act, Occupational Safety and Health Act, Employment Act, Wages Councils Act, Malaysian Anticorruption Commission Act (Section 17A), other applicable laws and subsequent revision of the laws and regulations.</p> <p>The contractor shall adhere to the United Plantations' company policies, MSPO and RSPO requirements includes human right policy (no child labor, no forced and trafficked labor, equal treatment).</p>	Yes
2.2.3	<p>All Memorandum of Agreement are included with term and conditions that contractor shall adhere to UP's Company Policies which includes no child labour, no forced and trafficked labour, equal treatment, etc.</p>	Yes



2.3.1 (C)	The mill operates on 'IP Module' and source of FFB are from company owned RSPO Certified estates which includes Ulu Bernam Estate, Changkat Mentri Estate, Lima Blas Estate and Charong Estate. The mill is not receiving FFBs from external estates, collection centers as well from smallholders.	Yes				
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Principle 3: Optimise productivity, efficiency, positive impacts and resilience						
Indicator	Summary of Findings	Compliance (Y/N) and NC#				
3.1.1 (C)	All the Estates and Mill have established and documented their Business Plan which reflected in the form of Annual Budget and Projection for 3 years. The business plan contains the details on costing of Harvesting, Upkeep & Cultivation, Manufacture, General Charges, Production of FFB, CPO, PK, OER and CAPEX. Sample taken as follows at Changkat Mentri Estate:-	Yes				
	Total area: 2,044.20 Hectares					
	Account (RM/ Tonne CPO)		2024	2025	2026	2027
	Upkeep & Cultivation		480.28	471.26	497.46	480.97
	Harvesting		264.68	261.80	265.50	262.20
	Manufacture & General charges		297.84	296.50	299.00	297.00
	FFB (Mt)		53150.00	54966.30	58784.95	58,000.55
	CPO (Mt)		11,960.00	11,949.20	12,779.34	12,608.82
	PK (Mt)		2,660	2,680	2,750	2,780
	OER%		22.5	23.0	23.0	23.0
	KER%		5.0	5.0	5.0	5.0
	No Scheme Smallholders in this Certification Complex.					
3.1.2	The Estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:	Yes				
	Operating centre		Year	Area/ Ha	Planting Material	
	Ulu Bernam Estate		2024	38.70	DXP	
			2025	71.59	DXP	
			2026	NIL	NIL	
			2027	43.50	DXP	
			2028	102.90	DXP	
	Lima Blas Estate		2024	183	DXP	
			2025	299	DXP	
2026		183	DXP			



			2027	145	DXP																										
			2028	NIL	NIL																										
		Charong Estate	2024	NIL	NIL																										
			2025	168.07	DXP																										
			2026	NIL	NIL																										
			2027	NIL	NIL																										
			2028	NIL	NIL																										
			Changkat Mentri	2024	142.80	DXP																									
		2025		32.40	DXP																										
		2026		29.60	DXP																										
		2027		60.70	DXP																										
		2028		95.10	DXP																										
3.1.3	All the Estates and Mill under Ulu Bernam Optimill Certification have conducted the Annual Management Review Meeting. The details as below:						Yes																								
	<table><tr><td>Operating center</td><td>Date conducted</td><td>Venue</td><td>Participation</td></tr><tr><td>Ulu Bernam Estate</td><td>2/5/2024</td><td>Ulu Bernam Main Office</td><td>10</td></tr><tr><td>Lima Blas Estate</td><td>27/5/2024</td><td>LBE Conference Room</td><td>6</td></tr><tr><td>Ulu Bernam Optimill</td><td>9/5/2024</td><td>Optimill Conference room</td><td>7</td></tr><tr><td>Charong Estate</td><td>8/5/2024</td><td>Ladang Charong Meeting room</td><td>6</td></tr><tr><td>Chaangkat Mentri Estate</td><td>3/5/3024</td><td>Changkat Mentri Office</td><td>7</td></tr></table>						Operating center	Date conducted	Venue	Participation	Ulu Bernam Estate	2/5/2024	Ulu Bernam Main Office	10	Lima Blas Estate	27/5/2024	LBE Conference Room	6	Ulu Bernam Optimill	9/5/2024	Optimill Conference room	7	Charong Estate	8/5/2024	Ladang Charong Meeting room	6	Chaangkat Mentri Estate	3/5/3024	Changkat Mentri Office	7	
Operating center	Date conducted	Venue	Participation																												
Ulu Bernam Estate	2/5/2024	Ulu Bernam Main Office	10																												
Lima Blas Estate	27/5/2024	LBE Conference Room	6																												
Ulu Bernam Optimill	9/5/2024	Optimill Conference room	7																												
Charong Estate	8/5/2024	Ladang Charong Meeting room	6																												
Chaangkat Mentri Estate	3/5/3024	Changkat Mentri Office	7																												
	Among the issues discussed such as: <div><div>1. Applicable laws and regulation</div><div>2. Business plan</div><div>3. Environmental Impact Assessment</div><div>4. Energy usage</div><div>5. Schedule waste management</div><div>6. Social Impact Assessment (SIA)</div><div>7. Stakeholder communication and consultation</div><div>8. Stakeholder comments/ request</div><div>9. Internal audit findings</div><div>10. External audit findings</div><div>11. Customers feedback</div><div>12. Process performance and product conformity</div><div>13. Changes that could affect the management system</div><div>14. Recommendation for improvement</div><div>15. Improvement on yield</div></div>																														
3.2.1 (C)	All the Estates and Mill under Ulu Bernam Optimill Complex has established its Continuous Improvement Plan (CIP) programme based on the consideration of the						Yes																								

daily operations, social and environmental impact factors. The CIP is documented and maintained in the office. Amongst the CIP at Estates and Mill as follows:-		
1. Estates		
Continual improvement plan	Action plan	Target
Reduction in use of Pesticides, Herbicides and insecticides.	<ul style="list-style-type: none"> Continuous monitoring of pest through census to contain any outbreak at early stage Maximized of planting beneficial plants 	2028
	To reduce usage of herbicides by introducing rentice mowing to more applicable area and planting of IPM	Ongoing - 2028
Barn owl	Maintaining the boxes in good condition	Ongoing
	Target 1 box to cover 10 Ha. Schedule upkeep maintenance and repairing of the barn owl boxes. Quarterly census of boxes and population.	Ongoing
Reduce diesel usage	Continuously substitute all infield collection tractors with crawlers which will reduce diesel usage	Ongoing
Rentice mowing	To increase area that can be covered by rentice moving as soon as possible to reduce herbicides usage.	Ongoing - 2028
Domestic water usage	To educate workers on water saving	Ongoing
2. Mill		
Continual improvement plan	Action plan	Target
Battery less use in 2023 since replace 2022	To monitor and maintained the life span of batteries	Continuously - 2028
The decrease in the yar 2023 is mainly due to planned servicing of biogas engine and hydraulic power pack	To maintained on regular servicing schedule of vehicle / machineries.	Continuously - 2028
Usage of petrol is maintained in 2023 since controlled petrol issuance	To improved and sustain the usage of petrol by having good controls	Continuously - 2028
The decrease in 2023 is due to the controlled usage of the genset	Close monitoring on vehicle usage. Consistent turbine and biogas engine power supply which will avoid diesel genset usage.	Continuously - 2028

	Less accident cases in 2023	The target in future to achieve 100% by implementing good practices.	Continuously - 2028	
3.2.2	As per an Interview with Mr. Lee, Sustainability Manager, United Plantations Berhad submitted its annual report (ACOP 2023) on 23 rd April 2024 to the RSPO Secretariat through the Certification Body and was acknowledged by the RSPO ACOP Team. The report was verified and found adequate. Further, the client has also submitted Palm GHG and Peat Inventory to RSPO as part of the monitoring of the company's continuous improvements.			Yes
3.3.1 (C)	United Plantation Berhad has established several types of SOPs which includes: 1. Standard Operating Procedures for Estate (Initial released in 2007 and subsequent revisions) a) Standard Operations Procedures & Safe Operations Procedures <ul style="list-style-type: none"> Nursery Operations Replanting Upkeep mature/immature Oil Palm Water management Roads Paths Railway Locomotive Boundaries Oil Palm Pest Management Manuring immature and mature Oil Palm Harvesting and Collection Oil Mill RSPO Supply Chain Module Latest SOP on Recruitment of Executive, non-Executive (Staff), Local Workers, and Guest Workers. Protection of River Reserves (Riparian & Buffer Zone) Internal Audit Safe Deposit Lockers for Guest Workers' passports Traceability b) System for Tracking any Changes in Laws c) Triple Rinsing Empty Pesticide Containers 2. Standard Operating Procedures for Mills (Initial release in 2008 and subsequent revisions). <ul style="list-style-type: none"> Section 1A: Introduction Section 1B: Organization Section 2A: Reception station Section 2B: Fruit handling Section 3: Sterilization Section 4: Threshing Section 5: Empty bunch pressing Section 6: Digestion and pressing Section 7: Clarification Section 8: Kernel extraction 			Yes



	<ul style="list-style-type: none">• Section 9: Boiler house• Section 10: Engine room• Section 11: Raw water treatment• Section 12: Effluent treatment & waste management• Section 13: Laboratory• Section 14: Store system• Section 15: Workshop/ maintenance/ safety• Section 16: Office procedure• Section 17: Recruitment of guest workers <p>3. Safe Operating Procedures (Initial release in 2008 and subsequent revision)</p> <p>4. Field Manual (Initial release in 2004 and subsequent revision).</p>													
3.3.2	<p>A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. The mechanism to check consistent implementation of procedures is through internal audit by HRSS Department.</p> <p>Other mechanisms are Advisory Visit, Agronomist Visit and Internal Audit. Mill and estate have implemented Good Milling Practice (GMP) and Good Agriculture Practices (GAP) as per their own SOP's and applicable Legal and Other Requirement.</p> <p>The effectiveness implementation of all the mechanism on daily basis being conducted by Mill/ Estate Supervisor, Executive And Managers. The monitoring reports are available in the Mill And Estate for review.</p> <p>One of the SOP checking mechanisms that the management has conducted was on PPE implementation. Management has developed PPE inspection checklist for sprayers, drivers, fitters. The checklist consists of type PPE, date, signatures and verified by. Meanwhile for mill, the inspection checklist was categorized based on monthly respirator checklist, safety helmets, safety harness, PPE monitoring checklist. The inspection of PPE implementation was mentioned in one of the internal audit agenda.</p>	Yes												
3.3.3	<p>In Ulu Bernam Optimill Complex, the internal audit findings being as part of monitoring of SOP implementations. The internal audit was conducted on annually basis as below:-</p> <table><tr><td>Operating center</td><td>Date audit</td></tr><tr><td>Ulu Bernam Estate</td><td>21/03/2024</td></tr><tr><td>Lima Blas Estate</td><td>19/03/2024</td></tr><tr><td>Ulu Bernam Optimill</td><td>11/03/2024</td></tr><tr><td>Charong Estate</td><td>20/03/2024</td></tr><tr><td>Changkat Mentri Estate</td><td>12/03/2024</td></tr></table> <p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit or audit assessment.</p>	Operating center	Date audit	Ulu Bernam Estate	21/03/2024	Lima Blas Estate	19/03/2024	Ulu Bernam Optimill	11/03/2024	Charong Estate	20/03/2024	Changkat Mentri Estate	12/03/2024	Yes
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3.4.1 (C)	<p>During the site visit, found there is no extension of its operation or acquired new land for estate operations. Based on the SEIA's level of impact, those with low indications do not require any mitigation measures, for moderate/high a root cause identification and action plans required to manage the associated risks. Interviewed the Assistant</p>	Yes												



	<p>Manager on how he disseminates information to stakeholders and the respond received processes.</p> <p>Generally, the respondents who participated in SEIA are aware of the restriction on open burning, child labour, not contribute to any social issues, the estate and mill's activities have not resulted in any diseases or illness.</p> <p>Social and Environmental Impact Assessment (SEIA) for internal stakeholders was carried out as follows for each operating center:</p> <table border="1"> <thead> <tr> <th>Operating center</th><th>Date audit</th><th>Participation</th></tr> </thead> <tbody> <tr> <td>Ulu Bernam Estate</td><td>15th May 2025 and 24th May 2024</td><td>55</td></tr> <tr> <td>Lima Blas Estate</td><td>29th May 2024</td><td>26</td></tr> <tr> <td>Ulu Bernam Optimill</td><td>6th June 2024</td><td>16</td></tr> <tr> <td>Charong Estate</td><td>15th May 2024</td><td>58</td></tr> <tr> <td>Changkat Mentri Estate</td><td>25th April 2024</td><td>9</td></tr> </tbody> </table> <p>Among categories evaluated in the SEIA are as follows.</p> <ol style="list-style-type: none"> 1. Housing amenities 2. Occupational safety and health 3. Environmental pollution 4. Religious and education amenities' 5. Code of conduct 6. Others <p>As per respond, there are no negative issues have been raised by both internal and external stakeholders.</p>	Operating center	Date audit	Participation	Ulu Bernam Estate	15 th May 2025 and 24 th May 2024	55	Lima Blas Estate	29 th May 2024	26	Ulu Bernam Optimill	6 th June 2024	16	Charong Estate	15 th May 2024	58	Changkat Mentri Estate	25 th April 2024	9	
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3.4.2	<p>Social and Environment Impact Assessment was carried out at all United Plantation Berhad operating centers covering the topics on access and use rights, economics livelihood and working conditions, subsistence activities/amenities, human rights, cultural and religious values, medical & health facilities, and educational facilities.</p> <p>The purpose of this study is to measure and to understand both positive and negative social impacts of the estate operation towards the workforce. A set of questionnaires was distributed to the participation. Report has specified the type of respondents from gender, nationality, and workplace.</p> <p>Management plan has been established for positive issues since there is no negative issues has been highlighted during the assessment. Result of the assessment as follows:</p> <table border="1"> <thead> <tr> <th>Issue raised</th><th>Comments</th><th>Action plan</th></tr> </thead> <tbody> <tr> <td>Housing and amenities: utilities provided</td><td>All respondance are satisfied with the utilities provided</td><td>Management will continue to provide good quality utilities to the employees.</td></tr> <tr> <td>Housing and amenities: Road condition</td><td>All respondance are satisfied with the housing provided</td><td>Management will conduct regular road maintenance and monitor road condition</td></tr> </tbody> </table>	Issue raised	Comments	Action plan	Housing and amenities: utilities provided	All respondance are satisfied with the utilities provided	Management will continue to provide good quality utilities to the employees.	Housing and amenities: Road condition	All respondance are satisfied with the housing provided	Management will conduct regular road maintenance and monitor road condition	Yes									
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	Occupational safety and health: personal protective equipment (PPE)	All respondence receive the appropriate PPE for their respective works for free	Management will continue to provide good quality PPE to all employees	
	Environmental pollution: Pollution caused by operation	All respondence do not think that operation cause any significant form of pollution.	Management will continue to ensure operation do not cause any significant pollutant	
	Environmental pollution: environmental impacts	All respondence do not think that operations cause any negative impact to the environment	Management will ensure that it does not cause negative impacts to the environment.	
	Religious amenities	All respondence are satisfied with the religious amenities provided to them by management	Management will continue to provide good quality religious amenities to the employees	
	Awareness on company sustainability policy	All respondence are aware of the company sustainability policy	Management will continue to train and remind al employees on its sustainability policy	
3.4.3 (C)	Details of management and monitoring plan review and updated on annual basis with participation of internal and external stakeholders. Amongst the platform to monitor the effectiveness participation by Stakeholders are:- 1. Environmental Performance Monitoring Committee EPMC 2. Stakeholders meeting 3. OSH Meeting 4. Social and Environment Impact Assessment			Yes
3.5.1	United Plantations Berhad has established Procedures for recruitment for the recruitment of Local and Guest Workers. Given below are the procedures as evidence. 1. Recruitment of Local Workers. Revision 01, date: 31 st March 2020. 2. Recruitment of Guest Workers. Revision 03, date: 31 st March 2020. Foreign worker recruitment is fully managed by the HR Department. Selection and hiring are based on age [Min 18 years and not more than 45 years old] and medical fitness. As per stated in the procedure for hiring guest workers, the recruiting agent must adhere to the United Plantation Berhad's company Policies and SOP, MSPO and RSPO's requirements including Human Rights Policy, OSH Policy and Code of Conduct and Business Ethics. Differences between recruitment based on job order description where: <i>Attestation of job order must be made at respective Embassies of source countries (Eg: Indonesia, Nepal & Bangladesh)</i>			Yes

	<p><i>For Indian National, the demand letter and employment contract are through the Indian Government's e- Migrate portal. The demand letter should be signed by the respective Embassies, the Company and the Recruiting Agent.</i></p> <p>For any subsequent changes in the above procedures, appropriate revision and/or addendum will be incorporated into Standard Operating Procedures – Recruitment of Guest Workers.</p> <p>Additional, for Indian National's recruitment: The company and the Accredited Recruiting Agent (ARA) must register with e-Migrate portal for job order and employment contract, all transactions pertaining to Guest Workers' medical reports and calling visas.</p> <p>The Call Center will issue notice 1 to 7 (the sample Notice was available as per audit) to the candidates from Bangladesh throughout the journey as deemed fit. For candidates from Indonesia and India, only notices 1, 2, 3, 4, 5 and 7 is applicable (Notice 6 is not applicable for Indonesia and India). This is issued by HRSS and via ARA to the candidates.</p> <p>For recruitment of specific competency workers for mill and estates, it to advertise on company website or in local newspaper. As per sighted in Mill and Estate Employee details, no promotion of workers occurred in year 2024. The latest workers promotion to Mill and Estates Staff occurred in the year 2020.</p> <p>Verified the "Post-Arrival Orientation Programme" for foreign workers and among the information briefed were MAPA/NUPW Collective Agreements, Union, Company Policies. The form will be signed by the worker and trainer. Further, the above forms and policies will be translated into their native language.</p> <p>In terms of promotion, as per the interviewed with person in charge, management will come out with offer letter for promotion and later then confirmation letter.</p> <p>Sample was sighted as below:</p> <ol style="list-style-type: none"> 1. Offer letter for Mr. Muhammad Anwar bin Badul Rahman was given via letter Appointment as a probationary Junior Field Supervisor – Grade III (Clerical) dated 16th May 2023. Second letter for confirmation of appointment as a junior field Supervisor – Grade III (Clerical) was received dated 27th November 2023. – Lima Blas Estate 2. Offer letter for Mr. Magendran s/o Perisamy was given via letter appointment as a Laboratory Supervisor - Grade III (Clerical) dated 3rd October 2023 with 3 months' probation. - Optimill 	
3.5.2	United Plantations Berhad has established its Employment Procedures dated March 2020 approved Dato Carl Bek Nielsen, Chief Executive Director. The said employment	Yes



	<p>contract is explained and translated into the employees native language for their understanding.</p> <p>Sighted foreign workers employment contract [sample] written in dual language i.e English and Bengali for Bangladeshi workers, English and Tamil for Indian workers. The contract consists details of such as contract duration, wages, working hours, piece rate, rest day, accommodation. For local worker the employment contract is written in Bahasa Malaysia. Given below are the sampled employees employment contract as evidence</p> <table><tr><th>Operating center</th><th>Date joined</th><th>IC/ Passport No</th><th>Unique Identification No.</th><th>Nationality</th></tr><tr><td rowspan="4">Ulu Bernam Estate</td><td>14/09/2020</td><td>760122-xx-xxxx</td><td>214388</td><td>Malaysian</td></tr><tr><td>14/09/2020</td><td>651010-xx-xxxx</td><td>106289</td><td>Malaysian</td></tr><tr><td>14/09/2020</td><td>EJ065xxxx</td><td>214178</td><td>Bangladeshi</td></tr><tr><td>14/09/2020</td><td>EJ064xxxx</td><td>120084</td><td>Bangladeshi</td></tr><tr><td rowspan="5">Lima Blas Estate</td><td>14/03/2024</td><td>A0598xxxx</td><td>190909</td><td>Bangladeshi</td></tr><tr><td>13/03/2024</td><td>B0031xxxx</td><td>190907</td><td>Bangladeshi</td></tr><tr><td>13/03/2024</td><td>A0118xxxx</td><td>190906</td><td>Bangladeshi</td></tr><tr><td>01/02/2024</td><td>840210-xx-xxxx</td><td>190904</td><td>Malaysian</td></tr><tr><td>13/12/2022</td><td>680401-xx-xxxx</td><td>190831</td><td>Malaysian</td></tr><tr><td rowspan="6">Ulu Bernam Optimill</td><td>15/04/2024</td><td>V399xxxx</td><td>20675</td><td>Indian</td></tr><tr><td>25/10/2023</td><td>EL005xxxx</td><td>20670</td><td>Bangladeshi</td></tr><tr><td>25/10/2023</td><td>A0404xxxx</td><td>20671</td><td>Bangladeshi</td></tr><tr><td>22/07/2023</td><td>841223-xx-xxxx</td><td>20662</td><td>Malaysian</td></tr><tr><td>07/08/2023</td><td>990311-xx-xxxx</td><td>20663</td><td>Malaysian</td></tr><tr><td>01/01/2024</td><td>030526-xx-xxxx</td><td>20669</td><td>Malaysian</td></tr><tr><td rowspan="4">Charong Estate</td><td>28/1/2024</td><td>A1137xxxx</td><td>160045</td><td>Bangladeshi</td></tr><tr><td>28/1/2024</td><td>A0829xxxx</td><td>160046</td><td>Bangladeshi</td></tr><tr><td>28/12/2023</td><td>A1185xxxx</td><td>195483</td><td>Bangladeshi</td></tr><tr><td>28/12/2023</td><td>A0679xxxx</td><td>195482</td><td>Bangladeshi</td></tr><tr><td rowspan="6">Changkat Mentri Estate</td><td>25/08/2023</td><td>A1179xxxx</td><td>527411</td><td>Bangladeshi</td></tr><tr><td>09/06/2023</td><td>A0216xxxx</td><td>527332</td><td>Bangladeshi</td></tr><tr><td>23/08/2023</td><td>A0198xxxx</td><td>527387</td><td>Bangladeshi</td></tr><tr><td>23/08/2023</td><td>A0330xxxx</td><td>527396</td><td>Bangladeshi</td></tr><tr><td>25/08/2023</td><td>A0614xxxx</td><td>527428</td><td>Bangladeshi</td></tr><tr><td>25/08/2023</td><td>A1160xxxx</td><td>527404</td><td>Bangladeshi</td></tr></table>	Operating center	Date joined	IC/ Passport No	Unique Identification No.	Nationality	Ulu Bernam Estate	14/09/2020	760122-xx-xxxx	214388	Malaysian	14/09/2020	651010-xx-xxxx	106289	Malaysian	14/09/2020	EJ065xxxx	214178	Bangladeshi	14/09/2020	EJ064xxxx	120084	Bangladeshi	Lima Blas Estate	14/03/2024	A0598xxxx	190909	Bangladeshi	13/03/2024	B0031xxxx	190907	Bangladeshi	13/03/2024	A0118xxxx	190906	Bangladeshi	01/02/2024	840210-xx-xxxx	190904	Malaysian	13/12/2022	680401-xx-xxxx	190831	Malaysian	Ulu Bernam Optimill	15/04/2024	V399xxxx	20675	Indian	25/10/2023	EL005xxxx	20670	Bangladeshi	25/10/2023	A0404xxxx	20671	Bangladeshi	22/07/2023	841223-xx-xxxx	20662	Malaysian	07/08/2023	990311-xx-xxxx	20663	Malaysian	01/01/2024	030526-xx-xxxx	20669	Malaysian	Charong Estate	28/1/2024	A1137xxxx	160045	Bangladeshi	28/1/2024	A0829xxxx	160046	Bangladeshi	28/12/2023	A1185xxxx	195483	Bangladeshi	28/12/2023	A0679xxxx	195482	Bangladeshi	Changkat Mentri Estate	25/08/2023	A1179xxxx	527411	Bangladeshi	09/06/2023	A0216xxxx	527332	Bangladeshi	23/08/2023	A0198xxxx	527387	Bangladeshi	23/08/2023	A0330xxxx	527396	Bangladeshi	25/08/2023	A0614xxxx	527428	Bangladeshi	25/08/2023	A1160xxxx	527404	Bangladeshi	
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3.6.1 (C)	<p>United Plantations Berhad has established its Occupational Safety and Health Policy dated 8th March 2021 approved by Dato Carl Bek Nielson, Chief Executive Director.</p> <p>United Plantations Berhad has adopted the Guidelines for Hazard Identification, Risk Assessment and Risk Control Document No: JKKP DP 127/789/4-47B developed by Department of Occupational Safety and Health to conduct risk assessments of all its operations and in compliance to legal requirements as sample and stated below.</p>	Yes																																																																																																														

	<p>1. Changkat Mentri Estate</p> <ul style="list-style-type: none"> • HIRARC for 42 activities was available to address all the risks and hazards associated to the operations in the estate. The HIRARC was reviewed on yearly basis and sample of the activities are Harvesting, Pruning , Ablation, Manuring, etc. • HIRARC being reviewed whenever accidents occurred and in 2024, three (3) cases was recorded as chronology below:- <ul style="list-style-type: none"> - Case 1: Railway. Fracture over left medial malleolus. Date: 08/02/2024, Time: 6.30 pm. Patrick was assigned to inspect locomotive cages at field 15. While walking on the tract, he accidently slipped and fell at 6.30 pm. He was sent to Ulu Basir Clinic, then to Ulu Bernam Group Hospital and later to Teluk Intan Hospital. - Root cause: Uneven surface of the crusher run has caused the worker to stumble, slip and fall on the railway line. - Corrective action: Training and briefing on safe work procedure. Training was done on 25th April 2024 under safety training on Loco driver and hoper attendant. HIRARC was reviewed on 25th March 2024 under Harvesting – Locomotive ooperation. • Chemical Health Risk Assessment (CHRA), under Chemviro Enterprise, DOSH Reg. PK/05/04/1242, assessed by Mdm. Hemalatha a/p Tamil Selvan, HQ/13/ASS/00/316 assessed on 7th June 2022, Report Ref. No: HQ/13/ASS/00/316-2021/034. • Medical Surveillance Programme has been performed successfully on 13th April 2024 for workers exposed to Sprayer, Power spray, Mechanized P&D spraying, Trunk injection, Fitter and Ultraboom. All the 18 workers are declared fit to work. • Initial Noise Risk Assessment by AEQ Safety Respond and Engineering by Mr. Harrison Perabu Gunasakaran, DOSH Registration No: HQ/17/PEB/00/00011, Project Ref: LCM2020-1.9, Assessed on 1st September 2020 for Locomotive driver, Superbull driver, Harvester, Tractor driver and General worker. • An audiometric test was conducted by Ansonex Resources Group on 25th April 2024 to 45 workers and the report indicated all of them are Normal Audiometric Results. 	
3.6.2 (C)	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2024 and monitored via inspections to address the identified health and safety risks.</p> <p>Ulu Bernam Optimill Complex has established OSH Plan for 2024. The plan consists of:</p> <ul style="list-style-type: none"> • OSH workplace audit/ inspection • Safety performance • Accident data update • Sprayer medical examination • First aid training. 	Yes



	<ul style="list-style-type: none">• Chemical exposure monitoring• Audiometric Monitoring• Etc <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions will be taken.</p>																											
3.7.1 (C)	<p>All the Estates and Mill has conducted Training Need Analysis for all Employee, Management and Contractors. The need analysis was conducted based on the job designation and training required by the job type. Trainings was identified for management, employee and contractors and programmed throughout FY 2024. The training identified covers the safety and health, environmental and social aspect. Sample taken at Ulu Bernam Optimill as below:-</p> <table><tr><th>Training Topics</th><th>Target group</th></tr><tr><td>Training on company policy</td><td>All staff and workers</td></tr><tr><td>Lock out – tag out (LOTO) & electrical safety training</td><td>Electrical department/ maintenance</td></tr><tr><td>Human right training</td><td>All staff and workers</td></tr><tr><td>Chemical spillage and safety training</td><td>Office/ store/ lab/ pump house/ workshop/ maintenance</td></tr><tr><td>Fire drill</td><td>All staff and workers</td></tr><tr><td>Supply chain training</td><td>Weighbridge operator and loco driver</td></tr><tr><td>SOP & HIRARC for boiler operation</td><td>Boiler station</td></tr><tr><td>Confine space training</td><td>ERT team/ Biogas plant/ boiler station/ sterilizer station/ kernel plant/ tippler</td></tr><tr><td>First aid and CPR</td><td>All staff and workers</td></tr><tr><td>SOP & HIRARC for working at height</td><td>Electrical department/ maintenance/ cleaning team</td></tr><tr><td>SOP & HIRARC for sterilizer station</td><td>Sterilizer station/ kernel plant/ tippler</td></tr><tr><td>SOP & HIRARC for EB Press and cutter</td><td>EBP station / reception station/ oil station</td></tr></table>	Training Topics	Target group	Training on company policy	All staff and workers	Lock out – tag out (LOTO) & electrical safety training	Electrical department/ maintenance	Human right training	All staff and workers	Chemical spillage and safety training	Office/ store/ lab/ pump house/ workshop/ maintenance	Fire drill	All staff and workers	Supply chain training	Weighbridge operator and loco driver	SOP & HIRARC for boiler operation	Boiler station	Confine space training	ERT team/ Biogas plant/ boiler station/ sterilizer station/ kernel plant/ tippler	First aid and CPR	All staff and workers	SOP & HIRARC for working at height	Electrical department/ maintenance/ cleaning team	SOP & HIRARC for sterilizer station	Sterilizer station/ kernel plant/ tippler	SOP & HIRARC for EB Press and cutter	EBP station / reception station/ oil station	Yes
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SOP & HIRARC for sterilizer station	Sterilizer station/ kernel plant/ tippler																											
SOP & HIRARC for EB Press and cutter	EBP station / reception station/ oil station																											
3.7.2	<p>The Mill and Estates have established its Training Needs Analysis to determine the training needed for its employees based on the major tasks performed by an employee and their position. Subsequently, developed an Annual Training Programme to implement the planned training. For each training conducted, list of participants, evaluations and photo evidences were documented. Amongst the training conducted are as sample below:-</p> <p>1. Ulu Bernam estate</p> <table><tr><th>Type of training</th><th>Target group</th><th>Date done</th></tr><tr><td>SOP and HIRACR on Harvesting – Mechanized</td><td>Castas Harvester and mandoras</td><td>11/01/2024</td></tr><tr><td>SOP and HIRACR on Harvesting – Manual</td><td>All harvester and mandoras</td><td>11/01/2024</td></tr></table>	Type of training	Target group	Date done	SOP and HIRACR on Harvesting – Mechanized	Castas Harvester and mandoras	11/01/2024	SOP and HIRACR on Harvesting – Manual	All harvester and mandoras	11/01/2024	Yes																	
Type of training	Target group	Date done																										
SOP and HIRACR on Harvesting – Mechanized	Castas Harvester and mandoras	11/01/2024																										
SOP and HIRACR on Harvesting – Manual	All harvester and mandoras	11/01/2024																										

	SOP and HIRACR on Manuring – Mechanized	Assistant in charge, supervisor and mandores, workers	10/01/2024	
	Fire drill	Emergency response team	11/03/2024	
	OSHA Meeting	OSHA committee members	27/03/2024	
	First aid training	Supervisor, storekeeper, mandore	19/06/2024	
	SOP and HIRARC on census workers	Assistant in charge, supervisor and mandores, census workers	04/06/2024	
	2. Ulu Bernam Optimill			
	Type of training	Target group	Date done	
	Training on company policy	All	8,14 & 20/01/2024	
	LOTO	Maintenance and electrical	29/01/2024	
	SOP & HIRARC for tippler operation	Tippler station operators	25/02/2024	
	SOP & HIRRC for locomotive operation	Weighbridge team	08/02/2024	
	ERT team training	All	15/03/2024	
	Fire drill	All	28/03/2024	
	Working at height training	Maintenance and cleaning	03/06/2024	
	First aid training	ERT team	08/06/2024	
	Chemical spillage and safe handling	Store and laboratory	17, 24/04/2024	
	Supply chain training	Mill and estate	20/06/2024	
3.7.3	Training conducted from time to time to all personnel critical in SCCS effective implementation.			Yes
Supply Chain Requirements for Mills				
Identity Preserved Module				
3.8.1	<p>The mill operates on IP Module and receives only FFB supplies from the company's own RSPO certified estates.</p> <p>Based on the Mill's production figure, an interview with Weighbridge Operator, sampled of FFB D/O, reveals there is no purchase of FFB from outside parties or smallholders.</p> <p>The mill has 2 CPO storage tanks with each 1500MT and 3 dispatch tanks (100MT). For kernel silo there are 2 dispatch tanks with 100MT. Since this is an IP mill therefore no separated storage system implemented.</p> <p>As of 26th June 2024, based on the Weighbridge master list and production figure, the mill receives FFB from:</p> <ul style="list-style-type: none">1) Ulu Bernam Estate2) Changkat Mentri Estate3) Lima Blas Estate4) Charong Estate (Sg. Erong & Sg. Chawang)			Yes



Mass Balance Module		
3.8.2	The mill is certified under the IP module and receives FFB from RSPO certified United Plantation Berhad states, as stated in 3.8.1.	N/A
3.8.3	The estimated tonnage of CPO and PK for period June 2023 – May 2024 has been verified and the figures are reported in the public summary report. The Shipping and Logistics Department - UNITATA to register the transaction of CSPO / CSPK in the Palm Trace during physical deliveries and records maintained accordingly.	Yes
3.8.4	<p>United Plantation Berhad is the RSPO Member # 1-0004-04-000-00. Optimill is registered in Palmtrace System. The Supply and Logistics Department - UNITATA to register the transaction of CSPO / CSPKO in the Palm Trace during physical deliveries and records are maintained accordingly.</p> <p>The Palm trace documents, and other relevant records emailed to buyer and mill. The mill eventually deducts the confirmed quantity of traded volume from their accounting system accordingly.</p>	Yes
Documented Procedures		
3.8.5	<p>Sighted the "SOP Supply Chain Procedure", RSPO Supply Chain Module D – CPO Mills: Identity Preserved, Revision:10, dated 1st October 2022 applicable for receiving & processing of FFB, the traceability and definition of RSPO SCC Modules.</p> <p>Sampled records are updated including the IP Bookkeeping updated until April 2024. Sighted management has conducted Supply Chain Training on 20th June 2024 attended by 5 participants who involve in supply chain operation.</p> <p>During visit to weighbridge station, interview the Weighbridge Operator has responded well to auditors' question on RSPO SCC requirements for incoming FFB.</p> <p>The management has appointed Mr. P. Seker, Director of Engineering, Upstream as the person who having overall responsibility for and authority over the implementation Supply Chain.</p> <p>Under Supply Chain Procedure", RSPO Supply Chain Module D – CPO Mills: Identity Preserved, Revision:10, dated 1st October 2022, Clause 13.0 there is procedure for handling of non-conforming palm oil products and/ or documents.</p>	Yes
3.8.6	<p>Under Supply Chain Procedure", RSPO Supply Chain Module D – CPO Mills: Identity Preserved, Revision:10, dated 1st October 2022, Clause 15.0; Internal Audit.</p> <p>The internal audit for RSPO SCC had conducted on 11th March 2024 by the Sustainability Manager (has attended RSPO SCC Training and working with RSPO scheme more than 5 years) which resulted with no findings against SCC requirements.</p> <p>Seen the internal audit report RSPO SCC Compliance Checklist there is no findings. The SCC SOP seen stating on the NC management that need to provide corrective action and follow up if there is any findings.</p>	Yes
Purchasing Goods		

3.8.7	<p>The mill operates on IP Module and receives only FFB supplies from company's own RSPO certified estates. Based on the Mill's production figure, interview with Weighbridge Operator, sampled of FFB D/O, reveals there is no purchase of FFB from outside parties or smallholders.</p> <p>The mill's weigh bridge system has the full detail records (requested the Weighbridge Operator to demonstrate) of incoming FFB, such as code of FFB supplying estate, cage number, field number, tare weight and net weight.</p> <p>As per IP Bookkeeping, the mill has no over production for the period May 2023 - April 2024. Aside, based on production output, the mill's utilizations is less than 50% on monthly basis, therefore no evidences sighted for over projected or actual overproduction of certified tonnage.</p> <p>In Supply Chain Procedure page 3/10 stating on the Sales & Dispatch. In page 1/10 stating production unit shall inform the CB if there is any projected overproduction in writing or email to seek for additional certified palm product quantum for that particular period.</p> <p>Mill have mechanism to handle non-conforming products / documents as specified in clause 13 of the SCC SOP. Cross verified with Senior Assistant Mill Engineer who was able to explain the non-conformity handling of either document error or physical products.</p>	Yes
Sales and Goods Out		
3.8.8	<p>The mill will ensure any Sale And Good out from the mill, the following document is available for verification:</p> <p>1. Crude Palm Oil</p> <ul style="list-style-type: none"> • The name and address of the buyer: • The name and address of the seller: • The loading or shipment / delivery date: • The date on which the documents were issued: • 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: Weighbridge ticket No - <p>Sighted documentation for CPO delivery as sample below:</p> <p>➤ Date: 30/05/2024 Vehicle No: BFB3615 Customer: UNIFUJI Product: SCPO Product (S-CPO) Transporter: SRI NARESH SDN BHD DO No: 53304 PO No: 217137-217145</p>	Yes



	Transaction Type: Despatch Weight Chit No.: 5720 Transaction No: 7341 Net weight: 39500 kg Certified Sustainable CPO (IP) Cert No: GGC-UPBUBO-RSPO-AA1-2019	
Outsourcing Activities		
3.8.9	Ownership of the products belong to UPB until reached customer destination. The mill is not outsourcing its operation to independent third parties. However, the mill has agreement with CPO and PK transporters that requires contractor(s) to comply with RSPO Supply Chain Standard for handling RSPO certified palm oil products, may subject to any audits including verification by the appointed third-party assurance body.	Yes
3.8.10	As per interviewed with Sustainability Manager, United Plantation Berhad has contractor several contractors. Verified through Transporters list there is complete information such company name, PIC, address, contact number and email. Contractors in the mill: 1. Excellent insight Sdn Bhd 2. Sakthy Transport Sdn Bhd 3. Sri Naresh Agency	Yes
3.8.11	The requirement available in document as per document Procedures have been documented as per document "SOP Supply Chain Procedure" revision #10 date on 01/10/2022.	Yes
Record Keeping		
3.8.12	Among the records verified were daily production report, daily haulage measure records, MB bookkeeping / sustainability accounting system, production and dispatch statement and weighbridge system. Retention period for SCC is 3 years as highlighted in item 16.0 (Record Keeping). The record of FFB received and CPO & PK sold is available in RSPO & MSPO Mass Balancing Records for Oil Mill. Records are maintained on a real-time basis.	Yes
Extraction Rate		
3.8.13	Conversion rate is based on production volume. Verified the Monthly Crop Report which has information of FFB processed, CPO produced and OER. Example data sighted in mill monthly progress report: ➤ Month: 30 th April 2024 FFB processed: 38,911.86 CPO Production: 8,292 OER: 21.31 % KER: 5.5 % ➤ Month: 31 st March 2024 FFB processed: 39,340.23 CPO Production: 8,477 OER: 21.55 %	Yes



	KER: 4.2 %	
3.8.14	OER and KER was derived daily and aggregated monthly for reporting internally and externally ie; Headquarters , MPOB, etc.	Yes
Processing		
3.8.15	Procedure for Supply Chain as per document "SOP Supply Chain Procedure" revision #10 date on 01/10/2022. The mill is not receiving non-RSPO crop from outside parties. Aside, the mill receives the crop by Cage Transportation and mixing of uncertified FFB is not possible based on the observation by Mill management.	Yes
Registration of Transactions		
3.8.16	<p>United Plantation Berhad is the RSPO Member # 1-0004-04-000-00. Optimill is registered in Palmtrace System.</p> <p>The Supply and Logistics Department - UNITATA to register the transaction of CSPO / CSPKO in the Palm Trace during physical deliveries and records are maintained accordingly.</p> <p>The Palm trace documents, and other relevant records emailed to buyer and mill. The mill eventually deducts the confirmed quantity of traded volume from their accounting system accordingly.</p>	Yes
Claims		
3.8.17	<p>UPB has obtained "RSPO Trademark License" RSPO membership number 1-0004-04-000-00 valid from 11th March 2024 until 10th March 2026. GGC-UPBUB-RSPO-AA2-2019.</p> <p>United Planation Berhad only use the RSPO Trademark logo for general corporate communication.</p>	Yes
Principle 4: Respect community and human rights and deliver benefits		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
4.1.1 (C)	<p>United Plantation Berhad has established Human Rights Policy approved by Dato' Carl Bek Neilsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia.</p> <p>As stated in the policy, the company is committed to the protection and advancement of human rights including prohibiting retaliation, intimidation and harassment against Human Rights Defenders (HRD), whistleblowers, complainants and community spokesperson.</p> <p>Communication of the policy has been conducted through handbook title "Employee & Stakeholder handbook" which has been established in 8 different languages. The handbook being issued during stakeholder meeting and initial appointment with Company.</p> <p>Furthermore, the policy also being relay through the briefing to workers as below:-</p>	Yes



	<ul style="list-style-type: none"> ➤ Ulu Bernam Optimill on 08, 14 & 20 January 2024 and attended by 127 mill employees. ➤ Ulu Bernam Estate, briefing on 12/03/2024 and attended by 200 employees. ➤ Lima Blas Estate, briefing on 08/05/2024 and attended by 195 employees. ➤ Charong Estate, briefing on 06/03/2024 and attended by 478 employees. ➤ Changkat Mentri Estate on 20/02/2024 and attended by 220 employees. 	
4.1.2	<p>There is no mercenaries and paramilitaries used in mill and visited estates operations. It has been confirmed based on interviews conducted with external stakeholders, workers and staff that the mill and estate management or staff does not involve in any form of harassment.</p> <p>Their job scope is more on patrolling for FFB theft, illegal entry by unauthorized personals and visit workers quarters to ensure the residents are safe and not violating company rules. There are 2 types of security personals in all visited estates;-</p> <ol style="list-style-type: none"> 1. The Auxiliary policy (AP) are with Police Logo with badge Number and their dress code is dark blue. 2. Watchman (WM) with light blue uniform. They are normally escorting the APs during patrolling. <p>The Auxiliary Police employed by the estates (mill is located within Ulu Bernam Estate) are engaged from Malaysian Palm Oil Association of Security Service's Sdn. Bhd.</p> <p>Based on the interview with Estate Manager, the Auxiliary Police has no weapon and their job scope restricting from managing workers directly but to report the estate manager for any violation against company policies.</p>	Yes
4.2.1 (C)	<p>United Plantation Berhad has established internal policy title whistle blower policy which the objective to provide channel for stakeholders to raise concerns and reassurance that they will be protected from reprisal or victimization for whistleblowing.</p> <p>UP Upriver Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure dated on 09/04/2021 (rev. 0) for grievance handling. This procedure is also linking to request & respond, consultation & communication and complaint & grievances matters.</p> <p>External Stakeholder, the process flows as listed herein: -</p> <ol style="list-style-type: none"> 1. Upon receiving the grievances, the issue to be settled within 30 days by Manager / HOD / Company Secretary. 2. If the matter remains unsettled, to forward to Company Secretary with supporting documents. 3. Grievance acknowledges by letter within 7 working days to stakeholders and Estate / Mill Manager from Company Secretary 	Yes



	<p>4. Grievance presented to UPB Executive Committee</p> <p>5. Action to be taken is recorded and stakeholders to be kept informed monthly on the status.</p> <p>6. Progress review by UPB Executive Committee until resolution</p> <p>7. The outcome of the resolutions is documented, and stakeholder be informed officially.</p> <p>8. Should the outcome not be resolved to mutual satisfaction of stakeholders and UPB, it shall be dealt under the provisions of Malaysian legal appeals procedure.</p> <p>Internal Stakeholder, the process flows as listed herein: -</p> <ol style="list-style-type: none"> 1. Within 4 working days of a grievance arising, employee to raise to immediate superior. 2. If the matter remains unsettled within a further 5 working days, the appropriate union committee shall make formal representation to the estate / mill Management. <p>Upon receiving the letter, Estate to held a meeting within 7 working days between Union Committee and executive /staff to whom the workers are responsible.</p> <ol style="list-style-type: none"> 3. If remain unsettled, the grievance shall be discussed between the Manager and union committee / workers welfare committee within a further 7 working days. 4. if remain unsettled then it be dealt under provision of Malaysian legal appeals and/or under the provision of industrial relations Act 1967 of the employment Act 1955. <p>As at audit period, the company does not receive any complaints or grievances from mill and estate workers.</p>	
4.2.2	<p>The management has taken initiative to established handbook which explain the complaint procedure in 8 different languages.</p> <p>Every worker in the mill and estate has been issued of the handbook and annually trainings are planned for all workers on the grievance mechanism. As for external stakeholders, the mechanism has been briefed by Sustainability Staff. Complaint procedure is explained to workers and external stakeholders during company's policy briefing as follows:-</p> <ul style="list-style-type: none"> ➤ Ulu Bernam Optimill on 08, 14 & 20 January 2024 and attended by 127 mill employees. ➤ Ulu Bernam Estate, briefing on 12/03/2024 and attended by 200 employees. ➤ Lima Blas Estate, briefing on 08/05/2024 and attended by 195 employees. ➤ Charong Estate, briefing on 06/03/2024 and attended by 478 employees. ➤ Changkat Mentri Estate, on 20/02/2024 and attended by 220 employees. 	Yes
4.2.3	<p>As per interview with mill and estate workers and staff, found they are aware on the grievance process or if there is any complaint and the method of communication such</p>	Yes



	as through verbal, email, meetings and others. The mill's and estate's stakeholder Logbook was sighted. Based on the records, the workers has requested assistance for house repair jobs.	
4.2.4	Internal Grievance Redressal Procedure and External Grievance Redressal Procedure for grievance handling dated 09/04/2021 (Rev. 0) included with the option of access to independent legal and technical advice as part of the conflict resolution mechanism.	Yes
4.3.1	United Plantations Berhad has a group level CSR project that was made publicly available in the company's Annual Report, sighted for 2023. Interviewed with HRSS member and estate & mill managers and found there was no request made by the surrounding communities. The estate has requests from local Tamil School at which the estate management has responded for the financial aid.	Yes
4.4.1 (C)	No case of Free, Prior and Informed Consent (FPIC) process in all sampled estates and mill. Documents related to the history of land tenure and the actual legal or customary use of the land are available for verification. Details on the ownership of the land as listed below: 1. <u>Ulu Bernam Optimill</u> The mill is located within Ulu Bernam Estate. Sighted land title No. 145238. Both the estate and the mill are owned by UP Berhad. 2. <u>Ulu Bernam Estate</u> The estate consists 8 land titles totaling 3,197.59 Ha of land. All the land titles are under company's ownership United Plantation Bhd. Quit rent for the above land tiles were paid Perak State Government on 16/04/2024 as sighted receipt 'Cukai Tanah' retained by the estate management. 3. <u>Lima Blas Estate</u> Sighted estate's legal land title Grand no. 18249 consists of 2891.8862 Ha on lot No. 1899. The estate land is owned by UP Bhd and permitted for oil palm planting. 4. <u>Charong Estate</u> The estate consists 5 land titles totaling 6,901.49 Ha of land. All the land titles are under company's ownership "United Plantation Bhd". Quit rent for the above land tiles were paid Perak State Government on 16/04/2024 and 22/01/2024 as sighted receipt 'Cukai Tanah Dan Parit' retained by the estate management. 5. <u>Changkat Mentri Estate</u> The estate consists 7 land titles totaling 2,550.53 Ha of land. All the land titles are under company's ownership United Plantation Bhd. Quit rent for the above land tiles were paid Perak State Government on 16/04/2024 as sighted receipt 'Cukai Tanah Dam Parit' retained by the estate management.	Yes



4.4.2	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There is no evidence of land extension nor new acquisition since from previous audit.	Yes
4.4.3 (C)	<p>The estates and mill own by the United Plantations Berhad and there is no evidence of land dispute nor customary land. Based on the interview with manager and workers there isn't any land dispute, land extension nor new actuation since from previous audit. Thus, the process of participatory mapping is not required.</p> <p>United Plantations Berhad has established SOP for boundary markers monitoring and visited estates are maintaining a GPS coordinates against their boundary stone markers of their land area.</p> <p>All the Estates has established boundary map called Location Of Boundary Stones prepared by UPRD (Research Department). As sample at Ulu Bernam Estate, the map was dated 12/07/2010, Ref No. O.252(2)/2481/2010. There were no natural waterways, government reserved land nor original boundary stone visually seen during field visit, trenches along neighbors as part of boundary marker being maintain. There are concrete poles [with GPS coordinates] indicating the boundaries. A monthly census record of the boundary stones maintained by field staff.</p> <p>In Lima Blas Estate, there is no evidence of land extension nor new acquisition since from previous audit.</p> <p>Furthermore at Charong Estate, the estate land area are adjoining to Felda Besout, and Sime Darby's Sg. Samak Estate. Visually seen during field visit, trenches along surrounding neighbors serves as boundary.</p>	Yes
4.4.4	<p>SOP for Land dispute Settlement as per FPIC and can be access through www.unitedplantations.com/sustainability/ [as in UP Annual report, page 85] is applicable if any arising issues from the local communities neighboring the estate or stakeholders or during land surveying process by authorized agencies.</p> <p>There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land.</p>	Yes
4.4.5 (C)	There is no evidence of land extension nor new acquisition since from previous audit.	Yes
4.4.6	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence	Yes
4.5.1 (C)	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence	Yes
4.5.2 (C)	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence	Yes
4.5.3	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land.	Yes
4.5.4	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land.	Yes



4.5.5	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land.	Yes
4.5.6	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land.	Yes
4.5.7	There is no new development for the mill and estates audited after 15 November 2018.	Yes
4.5.8 (C)	There is no new development for the mill and estates audited after 15 November 2018.	Yes
4.6.1 (C)	<p>United Plantations Berhad has developed Standard Operating Procedures – Land Acquisition, Issue Date: 24/8/2020. The objective is to handle land acquisition process in accordance to the national legislation and RSPO FPIC Protocols.</p> <p>Participatory mapping of the area to identify the extend of recognizing legal, customary or user rights, with involvement of affected parties. Negotiation in a fair and transparent manner through open and consensual agreement with owner / affected parties. Any compensation paid should be fair and in accordance with agreed amount.</p> <p>There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence.</p>	Yes
4.6.2 (C)	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.6.3	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.6.4	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.7.1 (C)	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.7.2 (C)	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.7.3	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.8.1	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.8.2 (C)	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes



4.8.3	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
4.8.4	There is no land dispute in the visited estates as the land belongs to United Plantation Berhad and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land	Yes
Principle 5: Support smallholder inclusion		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
5.1.1	The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri. Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.	N/A
5.1.2 (C)	The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri. Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.	N/A
5.1.3 (C)	The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri. Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.	N/A
5.1.4 (C)	The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri. Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.	N/A
5.1.5	The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri. Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.	N/A
5.1.6(C)	The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri. Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.	N/A



5.1.7	<p>Weighing equipment at the Estates and Mill are verified on annual basis. Details as follows;</p> <ul style="list-style-type: none"> • Weighbridge at Ulu Bernam Estate Borang D (Timbang dan Sukat) Permit Number: B 2057318, Equipment series no: 00831506 DM, Capacity: 80,000 kg x 20 kg, Valid: 19/12/2023 – 18/12/2024 • Lima Blas Estate Borang D (Timbang dan Sukat) Permit Number: D 234001, Equipment series no: 00813956 HJ, Capacity: 60,000 kg x 10 kg, Valid: 19/4/2024 – 18/4/2025 • Ulu Bernam Optimill Borang D (Timbang dan Sukat) Permit Number: B 2056288, Equipment series no: 172050274, Capacity: 80,000 kg x 10 kg, Valid: 7/7/2024 – 6/7/2025 Borang D (Timbang dan Sukat) Permit Number: B 2057699, Equipment series no: 223450467, Capacity: 6,000 kg x 10 kg, Valid: 24/5/2024 – 23/5/2025 Borang D (Timbang dan Sukat) Permit Number: B 2057698, Equipment series no: 171450817, Capacity: 6,000 kg x 10 kg, Valid: 24/5/2024 – 23/5/2025 • Changkat Mentri Estate Borang D (Timbang dan Sukat) Permit Number: D 120014, Equipment series no: 00865046GK, Capacity: 70,000 kg x 10 kg, Valid: 4/10/2023 – 3/10/2024 	Yes
5.1.8	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A
5.1.9 (C)	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A
5.2.1	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A

5.2.2	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A
5.2.3	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A
5.2.4 (C)	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A
5.2.5	<p>The Ulu Bernam Optimill is an Identity Preserved Mill as evidenced the Mill processes only FFB from its own estates namely Lima Blas, Ulu Bernam, Charong and Changkat Mentri.</p> <p>Therefore, the Ulu Bernam Certification unit is not involved with any smallholders in any of its operations and this Indicator is not applicable.</p>	N/A
Principle 6: Respect workers' rights and conditions		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
6.1.1 (C)	<p>United Plantation Berhad has established Human Rights Policy approved by Dato' Carl Bek Neilsen, Chief Executive Director dated 09/03/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia.</p> <p>The Non-discrimination and equal opportunities policy has been stated under objectives element bullet No 2 and 3 in Human Right Policy as follw.</p> <ol style="list-style-type: none"> Point 2 stated on all personnel are treated fairly and protection against any form of discrimination that would constitute a violation of human rights point 3 stated on equal opportunities to all personnel, this includes; recruitment, promotion, and remuneration <p>The policy is available in the company's website, displayed at the mill and estate office wall and notice boards. Furthermore, the policy also being relay through the briefing as follows:</p> <ol style="list-style-type: none"> Internal Stakeholders <ul style="list-style-type: none"> Ulu Bernam Optimill on 08, 14 & 20 January 2024 and attended by 127 mill employees. 	Yes



	<ul style="list-style-type: none"> ➤ Ulu Bernam Estate, briefing on 12/03/2024 and attended by 200 employees. ➤ Lima Blas Estate, briefing on 08/05/2024 and attended by 195 employees. ➤ Charong Estate, briefing on 06/03/2024 and attended by 478 employees. ➤ Changkat Mentri Estate, on 20/02/2024 and attended by 220 employees. <p>2. External Stakeholders</p> <ul style="list-style-type: none"> ➤ The meeting was conducted on 25/04/2024 collaborated with all Estates and Mill which was attended by 104 external stakeholders such as school teaches, villagers, government bodies, suppliers and as well as internal stakeholders. <p>Interviewed with local and foreign workers during field visit indicated that they aware of the non-discrimination and equal opportunity policy and they satisfied with the job offering, pay and no dissatisfaction despite the various ethnicity, religion and gender in the workplace.</p>	
6.1.2 (C)	<p>The recruitment of foreign workers is adhering to SOP for Recruitment of Guest Workers updated on 01/05/2024 Rev.11.</p> <p>UP has Guest Workers Policy dated on 31/12/2021, bullet No. 2 mentioned "No Guest Worker shall pay recruitment costs to come and work for UP". Based on the policy the company has paid the re-imbursement for internal traveling for the purpose of interview, medical examination and departure to Malaysia including food and lodging. In the same Policy page 2/2 bullet 2a and 2b mentioned on the consequences of breaching this policy by worker and recruitment agency.</p> <p>Based on interview held with Chairman of Guest Workers Welfare Committee who is also manager of respective units, the recruitment procedures will be based on the SOP for "Recruitment of Guest Workers. The cost involves in recruitment processes divided into:</p> <p><u>At Source Country</u></p> <p>Recruitment fee paid to recruitment agent will be paid by company.</p> <p>Those cost which will be reimbursed by the company are medical examination, immigration & security clearance, bestinet fees, visa endorsement, insurance, air passage (economy class) and e-Migrate clearance.</p> <p>Reimbursement of travelling, lodging and other expenses borne by Guest Workers for attending interviews & medical at Source Country.</p> <p><u>On Arrival (Malaysia)</u></p> <p>Fully fee pay by company. It includes of service charges, visa on arrival, levy, insurance guarantee, Fomema, transport from KLIA to estate/mill, upon completion of contract the company bear the cost of transport from estate/mill to KLIA, meals for first 2 days after arrival by estate/mill and New Guest Workers kit allowance of RM 150.00 for all newly arrived guest workers.</p>	Yes



	<p>Worker's interview found, they have received the payment accordingly and satisfied with the re-imbursement calculations.</p> <p>Interview HR Senior Manager on the ethical recruitment policy and what are the measures take to ensure zero recruitment is implemented. All employment been interview confirmed they are freely and voluntary enter into employment.</p> <p>All workers in the sampled estates and mill have valid employment contract which have been signed by both employee and employer. The company has established 'Individual Dossier Checklist' which was last revised on 06/03/2024.</p> <p>Sighted, Individual Dossier Checklist of each foreign worker prior to recruitment with 16 parameters / elements as guideline that is adhering to SOP for Recruitment of Guest Workers updated on 01/05/2024 Rev.11. All the recruitment cost borne by the Company.</p> <p>The Estate and Mill Management have provided 'safe deposit boxes' installed at workers home and the keys are retained by the individual workers for safety keeping under their own control.</p> <p>Contract of Employment were signed at worker's native place and the following Individual Dossier were verified;</p> <ul style="list-style-type: none"> ➤ Ulu Bernam Optimill <ol style="list-style-type: none"> 1. Udhyakumar Saminathan (Passport No. P061xxxx) arrived to mill from India on 20/04/2024. 2. Vignesh Arumugam (Passport No. V399xxxx) arrived to mill from India on 20/04/2024. 3. Saiful Islam (Passport No. EL005xxxx) arrived to mill from Bangladesh on 31/01/2024. 4. Md Rayahan Hasan (Passport No. A0404xxxx) arrived to mill from Bangladesh on 31/01/2024. ➤ Ulu Bernam Estate <ol style="list-style-type: none"> 1. Md Sumon Islam (Passport No. A1262xxxx) 2. Sajjad Hossain (Passport No. A0621xxxx) 3. Abdullah (Passport No. A076xxxx) ➤ Lima Blas Estate <ol style="list-style-type: none"> 1. MD Ajizul Rahman (Passport No. B0031xxxx) 2. Md Shomon Badsha (Passport No. A0598xxxx) 3. Mikael Sheikh (Passport No. A0118xxxx) ➤ Charong Estate <ol style="list-style-type: none"> 1. Anil Sharma (Passport No. A0821xxxx) 2. Md Rakib Nia (Passport No. A1185xxxx) 3. Md Atikur Rahman (Passport No. A0829xxxx) ➤ Changkat Mentri Estate <ol style="list-style-type: none"> 1. Md Delowar Fakir (Passport No. A008xxxx) 	
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	<p>2. Md Kamaruzzaaman (Passport No. A1256xxxx)</p> <p>3. Md Md Alauddin (Passport No. A1126xxxx)</p> <p>Terms and conditions specified in employment contract for foreign nationals such as contract period, wages, working hours, rest day, public holidays, annual leave are same as local workers.</p>	
6.1.3	<p>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 as per the policy above.</p> <p>Based on interview held with HRSS Senior Manager Mr. Norhazizi bin Nayan, all vacancies are advertised in 'Job Street' and UP website. Sighted latest advertisement from UP website for job title 'Call Centre Staff, Estate Hospital Assistance, Assistant Manager Estate, Cadet Planter Estate, and Junior Internal Audit Executive'. Requirement identified for all the jobs are related to the scope and no requirement based on ethnicity, gender or cultural background.</p> <p>Recruitments are based on employment procedures for recruitment, selection, hiring, promotion, retirement and termination covered both local and foreign (guest) workers in mill and both estates within UP upriver Business Unit as per sighted as following:</p> <ol style="list-style-type: none"> I. Standard Operating Procedures – Recruitment Of Executives And Non-Executive Staff; Rev. # 1; Date: 31/3/2020 II. Standard Operating Procedures – Recruitment Of Local Workers; Rev. # 1; Date: 31/3/2020 III. Standard Operating Procedures – Recruitment Of Guest Workers; Rev. # 3; Date: 31/3/2020 <p>All the Estates and Mill has conducted Induction Training Programme as details below:-</p> <ul style="list-style-type: none"> ➤ Ulu Bernam Optimill - 4 Guest Workers; 2 from Indian workers arrived on 20/04/2024 and 2 from Bangladesh workers arrived on 23/02/2024. ➤ Ulu Bernam Estate - 5 Guest Workers from Bangladesh dated 14/06/2024. The workers were arrived on 27/05/2024. ➤ Charong Estate - 5 Guest Workers from Bangladesh arrived to the estate on 28/12/2023 and 01/02/2024. ➤ Changkat Mentri Estate - 5 Guest Workers from Bangladesh arrived to the estate on 17/05/2024. <p>Among the information briefed were job type, contract period, wages, working hours, leave entitlement, festival of Malaysia, recruitment fees, safe keeping of passport, accommodation and amenities, transport, health and medical benefits, safety at work, repatriation, restriction and termination, abscondment, grievance procedures, freedom of association, UPB Sustainability Policies and etc.</p>	Yes

	The workers has signed acknowledgement on the "Onboarding Session" briefing in the "Guest workers' Onboarding Acknowledgement Letter For Session".	
6.1.4	<p>Based on worker employment master record, it has been confirmed no female workers has been employed specifically for field works such as spraying and manuring at all the unit audited. According HRSS Senior Manager Mr Norhazizi bin Nayan the company does not employ female workers chemical handling.</p> <p>Interview with the Gender committee chairladies and as well estate managers the company does not do pregnancy test as prerequisite for employment. Pregnancy test kit is available in the estate clinic and will be used upon recommendation by hospital assistant. There is no routine pregnancy test done.</p>	Yes
6.1.5 (C)	<p>All The Estates and Mill has established Gender committee and meetings are held twice year. Among the topics discussed include previous meeting minutes, covid-19 measures, assessment of new mother, audiometric test, harassment & violence, gender issues, etc. There is no sexual harassment report reported in all Estates and Mill. Details of the Gender Committee as follows:-</p> <ol style="list-style-type: none"> 1. Ulu Bernam Optimill - Chaired by Ms Puspavalli, Office Clerk. The latest committee meeting was held 14/05/2024 which was attended by 11 committee members. 2. Ulu Bernam Estate - Lead by Ms Siti Sariat, Estate's Chief Clerk. The latest committee meeting was held 20/05/2024 which was attended by 12 committee members. 3. Lima Blas Estate - Chaired by Ms Rozita , Estate's Chief Clerk. The latest committee meeting was held 15/05/2024 which was attended by 16 committee members. 4. Charong Estate - Chaired by Ms Kalaivani , Estate's Chief Clerk. The latest committee meeting was held 11/05/2024 which was attended by 13 committee members. 5. Changkat Mentri Estate – Lead by Ms N. Chitra Nadesan, Estate's Chief Clerk. The latest committee meeting was held 13/05/2024 which was attended by 9 committee members. 	Yes
6.1.6	<p>The wages' structure is based on MAPA/NUPW Agreement, 2019 for estate and mill. Sighted the pay slips clearly shows the calculations of gross salary, all deductions and net salary.</p> <p>Workers interviewed confirmed that they are being paid more than the stipulated Minimum Wage Order 2022 (RM 1,500.00) and evidence that each worker has been paid equal pay nevertheless gender, race, gender and religion.</p> <p>Sampled For Estate & Mill Worker's, May 2024 salary slips for different nationalist and gender. The minimum salary entitled is RM 1,500 for monthly rate unless they take unpaid leave or absent.</p> <p>➤ Ulu Bernam Optimill</p> <ol style="list-style-type: none"> 1. Mrs TBT , IC no. xxx2xx-06-xxxx, General Worker: RM 1,511.43 (24 days of work). 	Yes

	<ol style="list-style-type: none"> 2. Mr HAS, IC no. 020513-14-xxx) General Worker: RM 2,971.81 (23 days of work). 3. Mr. N, Passport no. T0xxxxx5) General Worker: RM 2,777.66 (26 days of work). 4. Mr. MP, Passport no. T7xxxxx7, General Worker: RM 3,410.20 (25 days of work). <p>➤ Ulu Bernam Estate</p> <ol style="list-style-type: none"> 1. Mr. T, IC No. xxxx10-08 -xxxx, General Worker, RM 1,571.94 (25 days of work). 2. Mr. TC, Passport No. Exxxxxxx8, General Worker : RM 1,967.11 (23 days of work). 3. Mr. AH, Passport No. EJxxxxxx9, Harvester: RM 2,077.28 (24 days of work). <p>➤ Lima Blas Estate</p> <ol style="list-style-type: none"> 1. Mrs. ABA, IC no. 8xxxxx-08- xxxx, General Worker: RM 1, 660.94 (25 days of work). 2. Mr.S, Passport No. Axxxxxxx9, General Worker: RM 1,910.76 (23 days of work). 3. Mr. DB, Passport No. Axxxxxxx6) General Worker: RM 12,112.78 (23 days of work). <p>➤ Charong Estate</p> <ol style="list-style-type: none"> 1. Mr. AS, Passport No. A0xxxxxx8, Harvester : RM 1,836.67 (25 days of work). 2. Mr. MRN, Passport No. A1xxxxxx9, Harvester : RM 1,689.98 (23 days of work). 3. Mr. MAR, Passport No. A0xxxxxx7, Harvester : RM 2,035.66 (25 days of work). <p>➤ Changkat Mentri Estate</p> <ol style="list-style-type: none"> 1. Mr. ECD, Passport No. A1xxxxxx3, Harvester : RM 1,805.11 (24 days of work). 2. Mr. M, Passport No. A0xxxxxx7, Harvester : RM 1,849.46 (2 days of work). 3. Mr. MSA, Passport No. A0xxxxxx6, Harvester : RM 2,560.26 (25 days of work). 	
6.2.1 (C)	<p>Collective agreement sighted in the document MAPA/NUPW agreement on the wages of harvesters, harvesting Kanganies, loaders and other loaders on oil palm estates, 2019 and MAPA/NUPW field and other general employees and fringe benefits agreement, 2019.</p> <p>Details of rate of each works were stated in the Agreement. All the workers are directly employed by United Plantation Berhad and each of them are having their own personal file. Workers' employment contracts are available in their native languages including English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali</p>	Yes



	and Indonesia, so that terms and condition of employment can be understand by employees from different nationalities.	
6.2.2 (C)	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Collective Agreement, Employment Act and Minimum Wages Order.</p> <p>Thus far, no issue on shortage of wages which does not meet the terms of contract of employment. Sample taken on the following: -</p> <ul style="list-style-type: none"> ➤ Ulu Bernam Optimill <ol style="list-style-type: none"> 1. Mrs TBT , IC no. xxx2xx-06-xxxx, General Worker 2. Mr HAS, IC no. 020513-14-0745) General Worker 3. Mr. N, Passport no. T0xxxxx5) General Worker 4. Mr. MP, Passport no. T7xxxxx7, General Worker ➤ Ulu Bernam Estate <ol style="list-style-type: none"> 1. Mr. T, IC No. xxxx10-08 -xxxx, General Worker 2. Mr. TC ,Passport No. Exxxxxxx8, General Worker 3. Mr. AH, Passport No. EJxxxxxx9, Harvester ➤ Lima Blas Estate <ol style="list-style-type: none"> 1. Mrs. ABA, IC no. 8xxxxx-08- xxxx, General Worker 2. Mr.S, Passport No. Axxxxxxx9, General Worker 3. Mr. DB, Passport No. Axxxxxxx6) General Worker ➤ Charong Estate <ol style="list-style-type: none"> 1. Mr. AS, Passport No. A0xxxxxx8, Harvester 2. Mr. MRN, Passport No. A1xxxxxx9, Harvester 3. Mr. MAR, Passport No. A0xxxxxx7, Harvester ➤ Changkat Mentri Estate <ol style="list-style-type: none"> 1. Mr. ECD, Passport No. A1xxxxxx3, Harvester 2. Mr. M, Passport No. A0xxxxxx7, Harvester 3. Mr. MSA, Passport No. A0xxxxxx6, Harvester 	Yes
6.2.3 (C)	<p>Records of pay slip, thumb print and check-roll documents for sample employees as per indicator 6.1.6 above shown 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>Sighted salary slips with no discrepancies over overtime calculations, number of working days and deductions. For all the estate audited, working hours estate general workers is from 7.00am to 2.30pm with 30 minutes breacktime 11.30 to 12.00pm.</p> <p>For Harvester, working hours is between 7.00am and 5.00pm with 2 breaks of 30 minutes each (11.30am -12.00nn and 2.30pm -3.00pm). The remaining 1 ½ hours of break can be taken at the liberty of worker within over the spread over time period.</p>	Yes



	<p>The mill runs on 3 rotating shifts. Working hours as follow:</p> <ul style="list-style-type: none"> – Ist Shift: 6.00am to 2.00pm with 20 minutes tea break at 9.00am and 30 minutes lunch break at 11.30am. – 2nd Shift: 2.00pm to 10.00pm with 20 minutes tea break at 4.30am and 30 minutes dinner break at 7.00pm. – 3rd Shift: 10.00pm to 6.00am with 20 minutes supper break at 12.00am and 30 minutes breakfast break at 04.00am. – <p>Both the mill and estate working hours are in compliance with Malaysian labor laws.</p>	
6.2.4 (C)	<p>Ulu Bernam Optimill & Ulu Bernam Estate is sharing same complex for residential. Line site inspection has been conducted on weekly basis by the Hospital Assistant. Sighted latest inspection done on estate Hospital Assistant Mr Sivaguru A/L Dhamotharan on 19/06/2024. The no issue reported in the Site Inspection Report. Linesite inspection for the mill workers quarters was last conducted on 19/06/2024 by Hospital Assistant Mr Sivaguru.</p> <p>Both the estate and mill workers being provided 24 hours of water and electricity supplies. The treated water seen clean (while visit to worker's house) and consumable after boiling. Only in Lima Blas Estate the company recently has established Syabas water supply form the line site. Other estates water supply is from treated water from tubewell. The estate Clinic is accessible for workers and dependents with 24 hours on call HA.</p> <p>Ulu Bernam Optimill and Ulu Bernam Estate domestics wastes are collected by the estate management three times a week and disposed to land fill located at field no. 57.</p> <p>As for Lima Blas Estate, the domestics wastes are collected daily basis and disposed to land fill located at field no. 18. Linesite inspection done by Hospital Assistant on weekly basis. Sighted latest inspection done on estate Hospital Assistant Mr Rajan on 20/06/2024. The no issue reported in the weekly Inspection report.</p> <p>In Charong Estate, domestics wastes are collected once every 2 days and disposed to land fill located at field no. 28 Erong Division. Linesite inspection done by Hospital Assistant on weekly basis. Sighted latest inspection done on estate Hospital Assistant Mr Vayaravanathan on 20/06/2024. The no issue reported in the weekly Inspection report</p> <p>At Changkat Mentri Estate, domestics wastes are collected once every 2 days and disposed to land fill located at field no. 57 Ulu Basir Division. Linesite inspection done by Hospital Assistant on weekly basis. Sighted latest inspection done on estate Hospital Assistant Mr D,Saravana Kumar 26/06/2024. The no issue reported in the weekly Inspection report.</p>	Yes
6.2.5	<p>The nearest town is Sabak Bernam about 30KM. There are 7 sundry shops is available within the mill and estate for this complex. It has been verified that price at the sundry shops is reasonable and affordable. This was cross verified with interviewed workers, who mentioned satisfactory.</p>	Yes



	The price of goods sold in the sundry shops are monitored by the estate management on regular basis. Sighted latest record mentoring of prices of goods sold in the sundry shop done on 12/04/2024 for all sundry shops within the complex.																																		
6.2.6	<p>No DLW established for reference in Peninsular Malaysia Plantation Industry. UP Upriver Business Unit has conducted a Prevailing Wage Assessment in A Collaboration with Monash University, Sime Darby Berhad & IOI Berhad based on RSPO Guidance on Calculating Prevailing Wages.</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). As a summary, the prevailing wages as follows: -</p> <p>1. Ulu Bernam Optimill</p> <table border="1"> <tr> <td rowspan="2">Prevailing Wages</td><td>Foreign worker</td><td>RM 3,303.03</td></tr> <tr> <td>Local worker</td><td>RM 2,780.76</td></tr> <tr> <td colspan="2">Bench mark of living wage based on Monash Uni Study</td><td>RM 1,735.47 (Perak Region)</td></tr> <tr> <td colspan="2">Bench mark of living wage in Source Country</td><td>RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)</td></tr> </table> <p>2. Ulu Bernam Estate</p> <table border="1"> <tr> <td rowspan="2">Prevailing Wages</td><td>Foreign worker</td><td>RM 2,418.99</td></tr> <tr> <td>Local worker</td><td>RM 2,449.58</td></tr> <tr> <td colspan="2">Bench mark of living wage based on Monash Uni Study</td><td>RM 1,735.47 (Perak Region)</td></tr> <tr> <td colspan="2">Bench mark of living wage in Source Country</td><td>RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)</td></tr> </table> <p>3. Lima Blas Estate</p> <table border="1"> <tr> <td rowspan="2">Prevailing Wages</td><td>Foreign worker</td><td>RM 2,290.56</td></tr> <tr> <td>Local worker</td><td>RM 2,210.95</td></tr> <tr> <td colspan="2">Bench mark of living wage based on Monash Uni Study</td><td>RM 1,735.47 (Perak Region)</td></tr> <tr> <td colspan="2">Bench mark of living wage in Source Country</td><td>RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)</td></tr> </table> <p>4. Charong Estate (Erong Division)</p>	Prevailing Wages	Foreign worker	RM 3,303.03	Local worker	RM 2,780.76	Bench mark of living wage based on Monash Uni Study		RM 1,735.47 (Perak Region)	Bench mark of living wage in Source Country		RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)	Prevailing Wages	Foreign worker	RM 2,418.99	Local worker	RM 2,449.58	Bench mark of living wage based on Monash Uni Study		RM 1,735.47 (Perak Region)	Bench mark of living wage in Source Country		RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)	Prevailing Wages	Foreign worker	RM 2,290.56	Local worker	RM 2,210.95	Bench mark of living wage based on Monash Uni Study		RM 1,735.47 (Perak Region)	Bench mark of living wage in Source Country		RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)	Yes
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Bench mark of living wage based on Monash Uni Study		RM 1,735.47 (Perak Region)																																				
Bench mark of living wage in Source Country		RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)																																				
Prevailing Wages	Foreign worker	RM 2,594.83																																				
	Local worker	RM 2,783.83																																				
Bench mark of living wage based on Monash Uni Study		RM 1,735.47 (Perak Region)																																				
Bench mark of living wage in Source Country		RM 1, 088.51 -(Bangladesh) RM 791.27 - (India) RM 1183.91 – (Indonesia)																																				
6.2.7	It has been verified that there is no casual and temporary workers has been recruited in Ulu Bernam Optimill Complex.	Yes																																				
6.3.1 (C)	<p>United Plantation Berhad has established Human Rights Policy approved by Dato' Carl Bek Neilsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia.</p> <p>As stated in the policy bullet no 4, we respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. Communication of the policy has been conducted through handbook title "Employee & Stakeholder handbook" which has been established in 8 different languages. The handbook being issued during stakeholder meeting and initial appointment with Company.</p> <p>The policy is available in the company's website, displayed at the mill and estate office wall and notice boards. Furthermore, the policy also being relay through the briefing as follows:</p> <p>1. Internal Stakeholders</p> <ul style="list-style-type: none"> ➤ Ulu Bernam Optimill on 08, 14 & 20 January 2024 and attended by 127 mill employees. ➤ Ulu Bernam Estate, briefing on 12/03/2024 and attended by 200 employees. ➤ Lima Blas Estate, briefing on 08/05/2024 and attended by 195 employees. 	Yes																																				



	<ul style="list-style-type: none"> ➤ Charong Estate, briefing on 06/03/2024 and attended by 478 employees. ➤ Changkat Mentri Estate, on 20/02/2024 and attended by 220 employees. <p>2. External Stakeholders</p> <ul style="list-style-type: none"> ➤ The meeting was conducted on 25/04/2024 collaborated with all Estates and Mill which was attended by 104 external stakeholders such as school teaches, villagers, government bodies, suppliers and as well as internal stakeholders. 	
6.3.2	<p>The company has established "Guest workers committee" for all the operating units and meeting are held once every 2 months to discuss on workers concerns and their welfare. Confirmed during interview with the workers that worker representatives were freely elected among and by the workers themselves.</p> <p>Meeting between the Workers' Representatives And Management being conducted as follows:-</p> <ul style="list-style-type: none"> • At Ulu Bernam Estate and Changkat Mentri Estate, sighted latest minutes of meeting was held on 19/06/2024 chaired by the Estate Manager. The minutes were documented in Bahasa Malaysia indicate which was attended by representative from various nationals. • At Charong Estate, the meeting held on 09/05/2024 chaired by the Estate Manager. <p>The minutes were documented in Bahasa Malaysia which was attended by representative from various nationals. Subject related workers welfare, housing facilities, health & safety, etc., are discussed in the meeting.</p>	Yes
6.3.3	<p>NUPW trade union already exist within UP operating units where company employees are free to join the union. Based on interviews held with unit managers and field interviews with workers noted there is no restriction from management for workers in joining or forming any trade union.</p>	Yes
6.4.1	<p>United Plantation Berhad has established Human Rights Policy approved by Dato' Carl Bek Neilsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia.</p> <p>As stated in the policy bullet no 9, we will not tolerate the use of child or forced labour, slavery and human trafficking in any of our plantation and facilities. Communication of the policy has been conducted through handbook title "Employee & Stakeholder handbook" which has been established in 8 different languages. The handbook being issued during stakeholder meeting and initial appointment with Company.</p> <p>No child policy is also incorporated into company's service contracts with contractors. Sample taken as below:-</p> <ul style="list-style-type: none"> • At Lima Blas Estate sighted "Memorandum Of Agreement" signed between Estate management and Contractor "Kanasan S/O SellaMuthu" to 'Super Madore' services from 01/01/2024 to 12/11/2024. In clause 18 of the 	Yes



	<p>contract has stated "That the contractor shall adhere to the UP's Policies - Human right policy (No child labour, no forced labour, equal treatment)"</p> <ul style="list-style-type: none"> At Changkat Mentri Estate, Memorandum Of Agreement signed between Changkat Mentri Estate Management and Contractor "Xing Lai Enterprise" dated 22/01/2024 for replanting work. Last page of the contract where the Estate Manager and the Contractor have signed has stated "That the contractor shall adhere to the UP's Policies - Human right policy (No child labour, no forced labour, equal treatment)" 	
6.4.2 (C)	<p>The company's established Standard Operating Procedures – Recruitment of Guest Workers that selection will be based on age and as per the company's policy, the minimum age of employment is 18 years old. For local workers, the company will keep a copy of identification card to verify the age of worker.</p> <p>Verification of employment contract, foreign workers passport and worker's data based, all workers at respective sites in accordance to the Children and Young Person (Employment) Act 1966, which at the time of employment he/she was above 18 years old.</p> <p>Based on the workers list sighted, at Ulu Bernam Estate, youngers person employed in the estate is Mr MD Ripon Islam from Bangladesh at age of 18 years on 17/12/2017 having date of birth on 04/02/1999.</p> <p>At Charong Estate, youngers person employed in the estate is Mr MD Samad Ali from Bangladesh joined at age of 18 on 17/12/2017 having date of birth on 15/05/1999.</p> <p>In Changkat Mentri Estate, youngers person employed in the estate is Mr Hasan Md Kamrul from Bangladesh joined at age of 20 on 31/12/2022 having date of birth on 10/11/2002.</p> <p>Interviews with workers and staff confirmed that there is no child labor or young labor has been employed.</p>	Yes
6.4.3 (C)	<p>From the review of mill and estates workers list there is no workers below 18 years been employed by the company.</p>	Yes
6.4.4	<p>United Plantation Berhad has established Human Rights Policy approved by Dato' Carl Bek Neilsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia.</p> <p>As stated in the policy bullet no 9, we will not tolerate the use of child or forced labour, slavery and human trafficking in any of our plantation and facilities. We are using the defination from United Nations Convention on the Rights of the Child which define child as anyonewhos is less than 18 years old.</p> <p>The mill operates on IP Model and there is no smallholders supplying FFB to the Mill. Company's 'no child labour' policy been communicated both internal external stakeholders. (Refer to indicator 6.1.1)</p>	Yes
6.5.1 (C)	<p>Rights Policy approved by Dato' Carl Bek Neilsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia.</p>	Yes



	<p>In the policy, the company is committed to the protection and advancement of human rights including prohibiting retaliation, intimidation, and harassment against Human Rights Defenders (HRD), whistleblowers, complainants, and community spokesperson. Based on interview with local and foreign workers, no cases on sexual harassment being reported thus far.</p> <p>The policy is available in the company's website, displayed at the mill and estate office wall and notice boards. Furthermore, the policy also being relay through the briefing as follows:</p> <ol style="list-style-type: none"> Internal Stakeholders <ul style="list-style-type: none"> Ulu Bernam Optimill on 08, 14 & 20 January 2024 and attended by 127 mill employees. Ulu Bernam Estate, briefing on 12/03/2024 and attended by 200 employees. Lima Blas Estate, briefing on 08/05/2024 and attended by 195 employees. Charong Estate, briefing on 06/03/2024 and attended by 478 employees. Changkat Mentri Estate, on 20/02/2024 and attended by 220 employees. External Stakeholders <ul style="list-style-type: none"> The meeting was conducted on 25/04/2024 collaborated with all Estates and Mill which was attended by 104 external stakeholders such as school teaches, villagers, government bodies, suppliers and as well as internal stakeholders. 	
6.5.2 (C)	<p>Group policy on reproductive rights available in Gender Policy of Sustainability Policies. Stated in bullet No. 5: "To protect the Reproductive Rights and Motherhood responsibilities of women as under the Universal Declaration of Human Rights and labour laws."</p> <p>Gender meeting minutes sighted with the agenda on reproductive rights. Communication of the policy has been conducted through handbook title "Employee & Stakeholder handbook" which has been established in 8 different languages. The handbook being issued during stakeholder meeting and initial appointment with Company.</p> <p>The policy is available in the company's website, displayed at the mill and estate office wall and notice boards. Furthermore, the policy also being relay through the briefing as follows:</p> <ol style="list-style-type: none"> Internal Stakeholders <ul style="list-style-type: none"> Ulu Bernam Optimill on 08, 14 & 20 January 2024 and attended by 127 mill employees. Ulu Bernam Estate, briefing on 12/03/2024 and attended by 200 employees. Lima Blas Estate, briefing on 08/05/2024 and attended by 195 employees. Charong Estate, briefing on 06/03/2024 and attended by 478 employees. 	Yes

	<p>➤ Changkat Mentri Estate, on 20/02/2024 and attended by 220 employees.</p> <p>2. External Stakeholders</p> <p>➤ The meeting was conducted on 25/04/2024 collaborated with all Estates and Mill which was attended by 104 external stakeholders such as school teaches, villagers, government bodies, suppliers and as well as internal stakeholders.</p>	
6.5.3	<p>The estates and mill have no new mother (recently given birth, breast feeding). This was confirmed in the Gender meeting minutes and verification of patient visiting book at estate clinics.</p> <p>However, the needs of new mothers has been briefly discussed during the Gender committee meeting conducted at individual estates / mill.</p>	Yes
6.5.4	<p>United Plantation Berhad has established internal policy title whistle blower policy which the objective to provide channel for stakeholders to raise concerns and reassurance that they will be protected from reprisal or victimization for whistleblowing.</p> <p>UP Upriver Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure dated 09/04/2021 (rev. 0) for grievance handling. This procedure is also linking to request & respond, consultation & communication and complaint & grievances matters.</p> <p>External Stakeholder, the process flows as listed herein: -</p> <ol style="list-style-type: none"> 1. Upon receiving the grievances, the issue to be settled within 30 days by Manager / HOD / Company Secretary. 2. If the matter remains unsettled, to forward to Company Secretary with supporting documents. 3. Grievance acknowledges by letter within 7 working days to stakeholders and Estate / Mill Manager from Company Secretary 4. Grievance presented to UPB Executive Committee 5. Action to be taken is recorded and stakeholders to be kept informed monthly on the status. 6. Progress review by UPB Executive Committee until resolution 7. The outcome of the resolutions is documented, and stakeholder be informed officially. 8. Should the outcome not be resolved to mutual satisfaction of stakeholders and UPB, it shall be dealt under the provisions of Malaysian legal appeals procedure. <p>Internal Stakeholder, the process flows as listed herein: -</p>	Yes



	<ol style="list-style-type: none"> 1. Within 4 working days of a grievance arising, employee to raise to immediate superior. 2. If the matter remains unsettled within a further 5 working days, the appropriate union committee shall make formal representation to the estate / mill Management. Upon receiving the letter, Estate to held a meeting within 7 working days between Union Committee and executive /staff to whom the workers are responsible. 3. If remain unsettled, the grievance shall be discussed between the Manager and union committee / workers welfare committee within a further 7 working days. 4. if remain unsettled then it be dealt under provision of Malaysian legal appeals and/or under the provision of industrial relations Act 1967 of the employment Act 1955. <p>As at audit period, the company does not receive any complaints or grievances from mill and estate workers.</p>	
6.6.1 (C)	<p>Interview with local and foreign workers in the mill and estate, it reveals they are freely and voluntarily entering into employment.</p> <p>All workers have valid employment contract which has been signed by both employee and employer, a copy given to workers.</p> <p>The audit team has sampled the validity and legality of worker's passport, work permit and employment contract agreement and found satisfactory with no negative issues.</p> <p>Interviewed with workers in the mill and estate found, they hold their passports and will surrender to estate office when permit renewals. The audit team did not receive feedbacks or grievance from workers, that their wages being hold due to debt bondage and no forms of forced labour.</p> <p>During field interviews, foreign workers mentioned that they are not secluded for any reason and have no restriction of movement.</p>	Yes
6.6.2 (C)	<p>United Plantations Berhad has developed Guest Workers Policy dated 31/12/2021 by Chief Executive Director. The Guest Workers Policy has included the following objectives:</p> <ul style="list-style-type: none"> • Contract substitution is strictly prohibited. • They ensure living quarters for all workers are in compliance with the "Workers' Minimum Standards of Housing and Amenities Act 1990". • All statutory payments with genuine receipts incurred in the recruitment process shall be reimbursed by the Company. • Conduct post-arrival orientation program for new guest workers. • Any forms of discrimination are prohibited. <p>Not applicable as no temporary workers employed at estate and mill. Works are done by permanent status employment.</p>	Yes



6.7.1 (C)	<p>All the Estates and Mill have form their own OSH Committee . Details as follows:-</p> <ol style="list-style-type: none"> 1. Ulu Bernam Optimill <ul style="list-style-type: none"> - Mr. M. Arishanggaran is OSH Chairman as appointed by Mr. P. Seker, Director of Engineering. OSH committee meeting are hed quarterly basis and meeting minutes is made available at the time of audit where items discussed includes: <ol style="list-style-type: none"> i. Review of OSH Policy. ii. HIRARC & SOP. iii. CHRA. iv. Annual Medical surveillance for lab / store / welders. v. Safety Performance. vi. OSH Training. vii. Safety Barriers. viii. Emergency Response Team. 2. Ulu Bernam Estate <ul style="list-style-type: none"> - Estate senior Manager Mr Ridzuan has been appointed as chairman of OSH Committee as sighted from letter of appointment dated 14/01/2023 signed Chief Executive Director Dato' Carl Bek-Nielsen. - Latest OSH committee meeting was held on 27/03/2024 chaired by the estate manager which includes review of OSH policy, HIRARC, CHRA, workplace assessment, etc. 3. Lima Blas and Changkat Mentri Estate <ul style="list-style-type: none"> - The Estate Manager has been appointed as chairman of OSH Committee. OSH meetings are held on quarterly basis and records meeting minutes are well maintained by the estate office. Among the subjects discussed in the OSH meeting includes review of OSH policy, HIRARC, CHRA, workplace assessment, etc. 4. Charong Estate <ul style="list-style-type: none"> - Estate Senior Manager Mr Siva Subramaniam has been appointed as chairman of OSH Committee as sighted from letter of appointment dated 03/04/2023 signed Chief Executive Director Dato' Carl Bek-Nielsen. - Latest OSH committee meeting was held on 20/04/2024 chaired by the estate manager which includes review of OSH policy, HIRARC, CHRA, workplace assessment, etc 	Yes
6.7.2	<p>Sighted Chapter V for emergency response plan that applicable for fire, flood, explosion, chemical poisoning and etc. which have impact to loss of life, property damage and extensive loss to property.</p> <p>As per OSH Officer, the purpose for ERP is to localize the emergency within the site and if possible, to eliminate the effects of incidents. Emergency response plan include the emergency contact number, and also have Guidelines on Accident,</p>	Yes



	<p>Emergency Procedures and Exit routes as well as assembly point available on notice board.</p> <p>During site visit to estate and mill, sighted the 1st Aid Boxes are available at workplace (with Field Supervisor) and periodical replenish programme being plan and the process was cross verified with Hospital Assistance.</p> <p>At mill, there are 14 first aid kits located at various strategic location of the mill. The mill also has 7 competent first aiders who have attended 'First Aid and Basic Life Support (CPR)' training conducted by AEQ Safety Respond And Engineering Training & Consultancy' on 08/07/2023.</p> <p>Charong Estate has total 26 first aid kit. Last refilled was done 30/04/2024. First aid training for was done 30/04/2024 by the estate HA attended by 26 workers. The estate has total 13 competent first aiders who has attended "Occupational First Aid & Cardio Pulmonary Resuscitation (CRP) AED – Level 1" conducted by Power Solution Training Management on 08/06/2024.</p>	
6.7.3 (C)	<p>Interview with workers during site visit to mill and estates found the workers are provided with PPE appropriate to the nature of work. Example in mill (no production during audit) a worker who does the cleaning work at boiler found wearing a pair of safety shoe, ear plug seen hanging around his neck and safety helmet.</p> <p>During the site visit to estate, found the harvesters wear rubber boot which provided by the company and interview with the OSH Officer found, the harvesters are not required to wear safety helmet as the company has implemented a new cutting method which the harvester will be harvesting by positioning himself at 45 Degree.</p> <p>HIRARC for harvesting verified the safety helmet as PPE is not applicable.</p> <p>Verified the PPE issuance record for harvesters found only with rubber boot / shoe and Scabbard issued to harvesters. As for the mechanizing harvesting, workers are issued of ear plug.</p> <p>As for sprayers and manurers, seen the PPEs issued were Wellington Shoe, Nitrile Gove (RNF 15), Vapoor Mask (3311K), Respirator with Cartridge Type (Trunk Injection) and Particular Respirator N95.</p> <p>Sighted PPE issuance record titled "PPE Record Sheet" for PPE issued to individual workers.</p> <p>At mill sighted : Magendran was issued with safety shoe On 20/01/2024, Siva was issued with ear plug On 19/03/2024 and Sangkaranathan was issued with safety helmet On 14/05/2024. At Charong Estate sighted record of Ziaur Rahman was issued with leather glove on 08/06/2024, Hairul was issued with lglove, ear plug and goggles on 11/06/2024. At Changkat Mentri Estate sighted Md Jhantou was issued with nitride glove, filter for respirator on 08/06/2024 and Azmot Ali was issued with filter for respirator and apron on 21/06/2024.</p> <p>Site visit to pesticide / chemical store, sighted the SDS are displayed clearly and the PICs were trained on the contents.</p>	Yes

	The estate has a changing room / shower room for sprayer and manurer to change their clothes before leaving to home.	
6.7.4	The Optimill shares the in-house clinic facilities of Ulu Bernam Estate. Both foreign and local workers are paid on SOCSO and insured by company's insurance. The company also has Group Hospital in Ulu Bernam Estate which is assessable to workers. Changkat Mentri Estate shares clinic with Ulu Basir complex. Medical treatment from company own clinic and as well as hospital free of charge to its worker.	Yes
6.7.5	<p>The monitoring of occupational injuries and Lost Time Accidents (LTA) is overseen by designated personnel at each operating center. Records of such incidents are documented using specific forms called JKKP 6 and JKKP 8, which are then submitted to the Department of Occupational Safety and Health (DOSH). JKKP 6 forms are submitted to DOSH immediately following an accident, while JKKP 8 serves as an annual summary of accident cases submitted yearly.</p> <p>The operating centers have each submitted their JKKP 8 forms to DOSH for the year 2023. Here are the details:</p> <ul style="list-style-type: none"> ➤ Ulu Bernam Optimill - JKKP 8 submitted to DOSH on 12/01/2024. There are 3 minor accidents reported and the company have submitted JKKP6 to DOSH. Accident investigation report for the 3 accidents retained by the mill office. ➤ Ulu Bernam Estate - JKKP 8 submitted to DOSH on 22/01/2024. There are 11 minor accidents reported and for those accidents resulted more than 4 days of medical leaves, the company have submitted JKKP6 and investigation report. ➤ Charong Estate - JKKP 8 submitted to DOSH on 29/01/2024 for Sg Chawang Division and Sg Erong Division. There is one minor accident for Sg Chawang Division and 6 accidents reported for and for Sg Erong Division. The company have submitted JKKP6 to DOSH for one accident resulted in more than 4 days of medical leaves. ➤ Changkat Mentri Estate - JKKP 8 submitted to DOSH on 16/01/2024. There is five minor accident reported for year 2023 for the estate. The company have submitted JKKP6 to DOSH for 4 accidents resulted in more than 4 days of medical leaves ➤ Lima Blas Estate - Lima Blas Estate have submitted and retained records of JKKP 8 submission to DOSH. There is three accident reported for year 2023 for the estate. 	Yes

Principle 7: Protect, conserve and enhance ecosystems and the environment

Indicator	Summary of Findings	Compliance (Y/N) and NC#
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7.1.1 (C)	<p>The IPM plan was sighted in document file 5D entitled A part of SOP ad Monitoring Records, Field Manual. No. S2, Integrated Pest Management. The IPM concept identified in the documents includes regular monitoring of pests, use of suitable agronomic practices including the conservation and introduction of beneficial broadleaf flowering plants for enhanced parasite and predator activity, conservation and utilization of natural enemies and the judicious use of chemical.</p> <p>Moreover, the company also has established SOP No. 7, Palm Oil Pest Management which has elaborated on the response to endemic situation and threshold levels. As supplementary guidance, UPB Research Department (UPRD) has provide document S3.1 Oil Palm Pests last updated on August 2019.</p> <p>Record of census for rat damage and bagworm attack has been made available. The management also provided record of barn owl box installation as well as rat baiting treatment for the year of 2024.</p> <p>From the record, sighted Ulu Bernam estate has marked the area of bagworm census & treatment covering both Division 1 & 2.</p> <table><tr><td>Estate</td><td>Census</td><td>Bagworm Treatment blocks</td></tr><tr><td>UBE</td><td>4 blocks are above 5% threshold level. (12, 16, 48 & 49)</td><td>5 blocks (6, 16, 17, 41 & 50) was previously treated.</td></tr><tr><td>LBE</td><td>No attack sign as all record shows low threshold level <0.18%.</td><td>No treatment available.</td></tr><tr><td>CE</td><td>1 block is at 4.14% (Field 16P) on 10/6/2024.</td><td>Spot treatment on 13/6/2024</td></tr><tr><td>CME</td><td>No attack sign as all record shows low threshold level <0.15% at Field 3 dated 10/6/2024.</td><td>No treatment available.</td></tr></table> <p>Record of rat damage census, baiting and re-census also made available.</p> <table><tr><td>Estate</td><td>Date of census</td><td>% of infestation</td><td>Baiting date</td><td>Re-census date</td></tr><tr><td rowspan="2">UBE</td><td>Field 30: 8/5/24</td><td>5.24</td><td>10/5/24</td><td>2/6/24 (3.97%)</td></tr><tr><td>Field 21: 6/5/24</td><td>7.43</td><td>9/5/24</td><td>1/6/24 (4.84%)</td></tr><tr><td rowspan="2">LBE</td><td>Field 6: 8/5/24</td><td>5.33</td><td>11/5/24</td><td>1/6/24 (1.29)</td></tr><tr><td>Field 14: 14/5/24</td><td>3.87</td><td>19/5/24</td><td>1/6/24 (3.22)</td></tr></table>	Estate	Census	Bagworm Treatment blocks	UBE	4 blocks are above 5% threshold level. (12, 16, 48 & 49)	5 blocks (6, 16, 17, 41 & 50) was previously treated.	LBE	No attack sign as all record shows low threshold level <0.18%.	No treatment available.	CE	1 block is at 4.14% (Field 16P) on 10/6/2024.	Spot treatment on 13/6/2024	CME	No attack sign as all record shows low threshold level <0.15% at Field 3 dated 10/6/2024.	No treatment available.	Estate	Date of census	% of infestation	Baiting date	Re-census date	UBE	Field 30: 8/5/24	5.24	10/5/24	2/6/24 (3.97%)	Field 21: 6/5/24	7.43	9/5/24	1/6/24 (4.84%)	LBE	Field 6: 8/5/24	5.33	11/5/24	1/6/24 (1.29)	Field 14: 14/5/24	3.87	19/5/24	1/6/24 (3.22)	Yes
Estate	Census	Bagworm Treatment blocks																																						
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	Field 14: 14/5/24	3.87	19/5/24	1/6/24 (3.22)																																				



		CE	Field 24: 17/1/24	12.40	28/1/24	4/3/24 (10.50) - 15/3/24																
			Field 19: 16/1/24	8.39	30/1/24	3/3/24 (6.30)																
		CME	Field 2: 4/5/24	8.20	5/5/24	2/6/24 (3.00)																
			Field 8: 6/5/24	6.70	7/5/24	28/5/24 (2.90)																
		<p>Barn owls are used for biological control of rats. Barn owl boxes are constructed at the average rate of 1 box to 14 ha. Barn owl monitoring plan has been emphasis by the management, as the estate has updated the monitoring of barn owl census on every quarterly. Details of the Barn Owl Occupancy as below:</p> <table><tr><td>Estate</td><td>Barn Owl occupancy</td><td>Date Census - latest</td></tr><tr><td>UBE</td><td>35.57%</td><td>22/4/2024</td></tr><tr><td>LBE</td><td>31.87%</td><td>20/5/2024</td></tr><tr><td rowspan="2">CE</td><td>49.68% (Erong Div)</td><td>6/4/2024</td></tr><tr><td>65.51% (Chawang Div)</td><td>NIL</td></tr><tr><td>CME</td><td>21.88%</td><td>19/5/2024</td></tr></table> <p>Leaf-eating pest (bagworm) census was regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census were available for verification as example censuses were done on 02/06/2024 at Division 1, Field No. 16 and reported 6.77% of Larva.</p> <p>The threshold limit is 5 larvae / frond. Treatment was conducted on 06/06/2024 and re -census conducted on 15/06/2024 the live larvae rate is 5.72%.</p> <p>After the 1st treatment, the following 2 weeks, re-census will be conducted to monitor the severity of the bagworm attack and immediate follow up treatment is applied if the rate is above 5%.</p> <p>Cypermethrin Treatment for treatment (Class III) is used as UPB has alternate Class I usage in all their operation with less harm chemical since 2020.</p> <p>Sighted during estate field verification at all estates, although there have been no major outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators such as <i>Cassia cobanensis</i>, <i>Turnera subulate</i>, <i>Antigonon leptopus</i>, <i>Carambola</i> sp. and others.</p>						Estate	Barn Owl occupancy	Date Census - latest	UBE	35.57%	22/4/2024	LBE	31.87%	20/5/2024	CE	49.68% (Erong Div)	6/4/2024	65.51% (Chawang Div)	NIL	CME
Estate	Barn Owl occupancy	Date Census - latest																				
UBE	35.57%	22/4/2024																				
LBE	31.87%	20/5/2024																				
CE	49.68% (Erong Div)	6/4/2024																				
	65.51% (Chawang Div)	NIL																				
CME	21.88%	19/5/2024																				
7.1.2	Based interview with Estate Assistants, estate management is aware of the need to monitor of any invasive species based on Global Invasive Species Database with guidance from UP Research Department (UPRD).	Yes																				

	Based on records and field verification, the estate has not planted any plant which is identified as invasive species in `cabi.org` website as per South East Asia region reference.													
7.1.3	<p>UPB has the policy and committed to "zero burning" as stated in the UPB Environment and Biodiversity Policy. The policy was signed by Dato" Carl Bek-Nielsen, dated 08 March 2021 to compliance to Zero Burning policy (1989).</p> <p>In addition, stated inside the Replanting SOP, under clause 2.2 Standards," United Plantations Berhad practices zero burning. This replanting technique deals with oil palms which have reached the end of their economic life, which are mechanically felled with excavators, windrowed, shredded and left to decompose along planting rows or pulverized in situ". Cross verified during site visit, no evidence of fire usage for pest control or any other purpose.</p>	Yes												
7.2.1 (C)	<p>Justification for pesticide usage for the estate been specified in document File 5C entitled A part of SOP and Monitoring Records, Field Manual no. D 5.1 titled" General Weed Control". Example sighted:</p> <ul style="list-style-type: none">Trade Name: 2,4-D Amine Name of Chemical: Dimethylamine Purpose: <i>Passiflora foetida</i>, <i>Asystasia gangetica</i> Concentration of a/i (%): 60 %Trade Name: Garlon Name of Chemical: Triclopyr Purpose: <i>Melastoma malabatricum</i>, <i>Chromolaena odorata</i> & <i>Clidemia hirta</i>. Concentration of a/i (%): 32 %Trade Name: Starane Name of Chemical: Fluroxypyr Purpose: <i>Mikania micrantha</i>. Concentration of a/i (%): 26%Trade Name: RH Cyper Name of Chemical: Cypermethrin Purpose: Bagworm control Concentration of a/i (%): 20.0%	Yes												
7.2.2 (C)	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the all estates in the range of records such chemical store bin card, SDS and "Summary of Pesticide Usage in LSC Oil Palm Cultivation" generated by UPRD. Example sighted at Ulu Bernam Estate:</p> <table><tr><td>Estate</td><td>Trade name</td><td>Chemical name / a.i</td><td>Field</td><td>Amount used</td><td>a.i / ha as May 2024</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>	Estate	Trade name	Chemical name / a.i	Field	Amount used	a.i / ha as May 2024							Yes
Estate	Trade name	Chemical name / a.i	Field	Amount used	a.i / ha as May 2024									



	UBE	Sentry	Glyphosate / 41%	1 & 2 4,5,6,8,9,25 7,28,30,31,32 14 56	30 L 40 L 50 L 90 L 10 L	0.365 a.i/ha	
		Malban	Metsulfuron methyl / 60%	5, 6, 54 16 28	0.75 L 0.45 L 0.6 L	0.007 a.i/ha	
	LBE	Garlon Mix	Triclopyr / 1.6%	15	36 L	0.007 a.i/ha	
		Alion	Indaziflam / 45.5 %	3	1L	0.0049 a.i/ha	
	CE	Entrust	Glufosinate Ammonium / 18%	8 28 70	120 L 74 L 70 L	0.20 a.i/ha	
		Sodium	Sodium Chlorate / 99%	8 28	50 L 50 L	0.507 a.i/ha	
	CME	Sentry	Glyphosate / 41%	2, 4, 28 1, 33 24. 29 23, 31 32 22 /	40 100 L 120 L 140 L 160 L 200 L	0.51 a.i/ha	
		Entrust	Glufosinate Ammonium / 18%	7 27	30 L 10 L	0.09 a.i/ha	
7.2.3 (C)	<p>Besides the implementation of IPM, estates have established plan to reduce pesticide usage through increasing number of IPM plants, planting cover crop, etc. Implementation of reduction of pesticide are monitored on annual basis using annual pesticide usage chart.</p> <p>As 2020, UPB Group as entire group has eliminated the usage of Class I chemical including but not limited to Monocrotophos for their bagworm treatment. As evidence Acephate 97G (Class II) is used as current practice for treatment.</p> <p>As part of the prevention plan for bagworm attack is through planting of beneficial plant surrounding the estate compound.</p> <p>The use of pheromone traps (e.g. Sime RB Pheromone) to combat the pest <i>Rhinoceros beetle</i> provides some relief from damage in mature palms adjacent to new replants and in young replants.</p>						Yes



	For replanting operation, the old oil palm trunk is felled and chipped by specific size and condition to reduce the RB infestation, and to fasten the decomposing period.																															
7.2.4	In all estates, there is a strict policy against prophylactic use of pesticides. Blanket spraying is not practiced, and soft grasses are actively maintained in the fields. In accordance with estate practices, insecticides are applied only after surpassing a predetermined threshold level, as outlined in the Standard Operating Procedure Guidelines. This approach ensures targeted and effective pest management while minimizing environmental impact.	Yes																														
7.2.5	<p>The company's OSH policy signed by CEO Dato" Carl Bek-Nielsen, dated 08 March 2021 has stated "Total Phase out of Paraquat weeding since 2010". As 2020, UPB Group as entire group has eliminated the usage of Class I chemical including but not limited to Monocrotophos for their bagworm treatment. As evidence Acephate 97G (Class II) and Cypermethrin are used as current practice for treatment.</p> <p>Verified the document entitled "List of Hazardous Chemicals to Health" prepared by the estate as their chemical Register. There is no pesticide categorized as World Health Organization Class 1A or 1B is used by the estate. During site visit to estate's chemical store sighted no Class 1A or 1B chemicals.</p>	Yes																														
7.2.6 (C)	<p>SOP for chemical handing is per Chapter IV Section 5, "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" under Occupational Safety and Health Manual last updated on 20/02/2008.</p> <p>Usage of the chemical is always based on specific product label and recommendation from the Chemical Hazard & Risk Assessment (CHRA) conducted by the qualified DOSH Assessor. As example on PPE usage, sprayers are provided with PPE kit specified for sprayers such as apron, googles, masks, rubber boots and gloves. PPE issuance is verified from record of "PPE Inspection Checklist" based on individual record.</p> <p>All the estates have established annual training plan for year 2024 titled "Sustainability & OSHA Training Programme 2024" which includes training for pesticide handlers. Sighted attendance sheet for series of training conducted at for all estates as below:</p> <table border="1"> <thead> <tr> <th>Training</th><th>Date</th><th>Participants</th></tr> </thead> <tbody> <tr> <td colspan="3">Ulu Bernam</td></tr> <tr> <td>SOP & HIRARC on Chemical pre-mixing/ Chemical Spillage</td><td>12/6/24</td><td>2</td></tr> <tr> <td>SOP & HIRARC on Spraying – Mechanised</td><td>15/4/24</td><td>10</td></tr> <tr> <td colspan="3">Lima Blas</td></tr> <tr> <td>Selective Weeding</td><td>16/5/2024</td><td>6</td></tr> <tr> <td>Spraying & P&D</td><td>18/4/2024</td><td>6</td></tr> <tr> <td>Chemical Premixing</td><td>17/2/2024</td><td>2</td></tr> <tr> <td colspan="3">Charong</td></tr> <tr> <td>Chemical Spillage Training</td><td>28/5/2024</td><td>5</td></tr> </tbody> </table>	Training	Date	Participants	Ulu Bernam			SOP & HIRARC on Chemical pre-mixing/ Chemical Spillage	12/6/24	2	SOP & HIRARC on Spraying – Mechanised	15/4/24	10	Lima Blas			Selective Weeding	16/5/2024	6	Spraying & P&D	18/4/2024	6	Chemical Premixing	17/2/2024	2	Charong			Chemical Spillage Training	28/5/2024	5	Yes
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7.2.7 (C)	<p>During site visit to estate chemical stores noted all chemicals are stored in manufacturers' original containers on pallet and neatly stacked. Storage chemicals are as per company's SOP "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" under Occupational Safety and Health Manual last updated on 20/02/2008.</p> <p>Changkat Mentri Estate has shared compound with Ulu Basir Complex. There is general store consist of chemical store, workshop, POL store, diesel skid tank, equipment store, fertilizer store, SW store, pre-mix area and sanitation accommodations for sprayers after work.</p>	Yes																		
7.2.8	<p>Based on Mill's document titled "Waste Management Action Plan 2024", chemical containers are disposed to waste managers (license schedule waste collectors – Edsha Solutions Sdn. Bhd).</p> <p>Verified record of disposal of its contaminated empty chemical containers and last disposal was done 12/5/2024 as sighted from schedule waste disposal consignment record. Following is the details of disposal:</p> <p>Date disposal: 12/05/2024, for disposal of SW 409 Contaminated containers by Edsha Solutions Sdn Bhd.</p> <p>At all estate, some quantity of empty chemical containers is actively being re-use for the same purpose e.g. Premix activities. The containers which not able to re-use will be disposed as per scheduled waste regulation (Environmental Quality Act 1974). Sighted latest disposal record as follow:</p> <table> <tr> <th>Estate</th><th>Disposal Date</th><th>Contractor</th></tr> <tr> <td>UBE</td><td>9/5/2024</td><td>Edsha Solutions Sdn Bhd</td></tr> <tr> <td>LBE</td><td>21/6/2024</td><td>BRG Enterprise.</td></tr> <tr> <td>Charong</td><td>29/3/2024</td><td>Edsha Solutions Sdn Bhd</td></tr> <tr> <td>CME</td><td>15/4/2024</td><td>Edsha Solutions Sdn Bhd</td></tr> </table> <p>At Changkat Mentri Estate, the disposal of the empty chemical containers is through centralised scheduled waste store which been handle by Ulu Basir Estate.</p>	Estate	Disposal Date	Contractor	UBE	9/5/2024	Edsha Solutions Sdn Bhd	LBE	21/6/2024	BRG Enterprise.	Charong	29/3/2024	Edsha Solutions Sdn Bhd	CME	15/4/2024	Edsha Solutions Sdn Bhd	Yes			
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CME	15/4/2024	Edsha Solutions Sdn Bhd																		
7.2.9 (C)	There is no aerial spraying of pesticide practiced by the estates.	Yes																		
7.2.10 (C)	The mill has conducted additional CHRA on 12/4/2024 by DOSH Registered Assessor Mr. Thilaga A/P Annan Thamoorthi; DOSH Reg, No. HQ/17/ASS/00/00012. The above assessments reports have recommended to conduct biological monitoring and medical surveillance for parameter: Manganese and n-Hexane.	Yes																		



The mill has conducted periodic chemical exposure monitoring for both for mill and biogas plant operation. Latest chemical exposure monitoring for the mill and biogas plant was conducted on 22/12/2023 by DOSH registered Assessor Mr. Balamurali A/L Raman (DOSH Reg. No.: HQ/17/JHI/00/00012) as sighted from Periodical Exposure Monitoring Report Ref no. HQ/17/JHI/00/00012-2023/152 for biogas plant and report ref no. HQ/17/JHI/00/00012-2023/151 for the mill.

Sighted latest medical surveillance carried out for both mill and biogas plant workers of total 14 mill operators. The breakdown is as below:

Task	No. of workers
Laboratory	3
Kernel Plant Operator	2
Welder	1
Store	3
Painters	5

The medical examination was carried out by DOSH registered OSH doctor, Dr. Lee Teik Leong (OHD: HQ/12/DOC/00/279). All the examined workers were found to be fit to continue with their respective duties.

At Ulu Bernam Estate, chemical exposure monitoring has been conducted for estate operation. Latest chemical exposure monitoring was conducted on 10/08/2022 by DOSH registered Assessor Mr Balamurali A/L Raman (DOSH Reg. No.: HQ/17/JHI/00/00012)

The estate has conducted CHRA on 07/06/2022 by DOSH Registered Assessor Ms Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316). Based on the report medical surveillance is not recommended for any of the work units. However, the management maintain to send the workers for medical surveillance. Latest medical surveillance conducted on 25/3/2024. Total of workers sent for the medical surveillance as below:

Task	No. of workers
Driver	7
Sprayer	17
Pre-mixer	1
Trunk Injection	2
Welder	3
Chemical & Diesel Handler	1
Field Supervisor	1
Store Attendant	1

All workers are found to be fit to continue with their respective duties.

	<p>Lima Blas Estate has conducted CHRA on 08/06/2022 by DOSH Registered Assessor Ms. Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316) as sighted from CHRA Report No. HQ/13/ASS/00/316-2022/035. Based on the report medical surveillance is recommended for chemical & fertilizer operator.</p> <p>Sighted latest report for medical surveillance carried out on 9&10/5/2024 for year 2024. The medical examination was carried out by Dr. Lee Teik Leong (DOSH: HQ/12/DOC/00/279) for total 23 estate workers which includes worker's activities. All the examined workers been certified by the doctor as fit to work as sighted from individual medical surveillance report.</p> <p>The estate has conducted CHRA on 08/06/2022 by DOSH Registered Assessor Ms. Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316) as sighted from CHRA Report No. HQ/13/ASS/00/316-2022/035. Based on the report medical surveillance is recommended for chemical & fertilizer operator.</p> <p>Sighted latest report for medical surveillance carried out on 9&10/5/2024 for year 2024. The medical examination was carried out by Dr. Lee Teik Leong (DOSH: HQ/12/DOC/00/279) for total 23 estate workers comprising sprayer, pre-mixer and Welder/Petrol & diesel handler. All the examined workers been certified by the doctor as fit to work as sighted from individual medical surveillance report.</p> <p>In Charong Estate, CHRA has conducted on 07/06/2022 by DOSH Registered Assessor Ms. Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316) as sighted from CHRA Report No. Hq/13/ASS/00/316-2021/033. Latest additional CHRA latest conducted on 1/6/2024 by the same assessor [Ref. No.: HQ/13/ASS/00/316-2024/112] for additional chemical usage; Garlon Mix, Entrust 18SL, Miracle Union and CH Malaxion 84. Based on the report medical surveillance is not recommended for chemical & fertilizer operator as there is no causes of ill health or workersfeedback to chemical hazardous to health and no systemic effect through skin absorption.</p> <p>Sighted latest report for organophosphate medical surveillance carried out on 4/4/2024 by Klinik & Surgeri Lee. The medical examination was carried out by Dr. Lee Teik Leong (OHD: HQ/12/DOC/00/279) for 45 personnel which includes worker's activities such as CKS & CDA Spraying, Pest & Disease, pre-mix, store keeper and trunk injection team. All the examined workers are found to be fit to continue with their respective duties.</p> <p>Changkat Mentri Estate has conducted CHRA on 07/06/2022 by DOSH Registered Assessor Ms Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316) as sighted from CHRA Report No. Hq/13/ASS/00/316-2021/034.</p> <p>The estate management have conducted additional CHRA and waiting for the report to be submitted. Sighted the memo from Chemviro Enterprise dated 8/5/2024 regarding those matters, estimated date of report submission is on 03/07/2024.</p> <p>Sighted latest report for organophosphate medical surveillance carried out on 13/04/2024 for year 2024. The medical examination was carried out by Dr. Lee Teik Leong (OHD: HQ/12/DOC/00/279) for total 19 estate workers comprising sprayers,</p>	
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	trunk injector and mandore. All the examined workers are found to be fit to continue with their respective duties.																
7.2.11 (C)	There is no female worker assigned by the Mill and Estates for handling chemicals. Based on mill workers list there is no worker below 18 years employed by the management.	Yes															
7.3.1	<p>The mill has established "Waste Management Action Plan 2024", approved by mill's Resident Engineer Mr. M. Arishanggaran. The action plan has listed 22 types of waste, source of waste, person in charge, targeted date and method of disposal. Schedule waste been adequately identified and disposed as per Scheduled Wastes Regulation. For evidence of disposal refer to 7.3.2.</p> <p>Wastes produced from the estate are identified in document "Types of Waste Products and Method of Disposal 2024". Based on the waste management plan scheduled wastes are to be disposed as per schedule waste regulation. The management plan has been considered the reduction, recycle and re-use approach. The disposal of the waste is based on toxicity and hazardous characteristics. Example of the waste management plan tabulated as below:</p> <table border="1"> <thead> <tr> <th>Type of Waste</th><th>Method of Disposal</th><th>Reduction Action Plan</th></tr> </thead> <tbody> <tr> <td>Scrap metal</td><td>Sold to Waste Manager</td><td>All scraps are sold to Waste manager</td></tr> <tr> <td>Used PPE (SW 410)</td><td>Sold to Waste Manager</td><td>Maintain and monitoring proper usage of PPE.</td></tr> <tr> <td>Spent Lubricant (SW305)</td><td>Sold to Waste Manager</td><td>To frequent service tractors to ensure no leakages.</td></tr> <tr> <td>Empty Chemical Container</td><td>Recycling by BRG Enterprise</td><td>Increase mowing IPM field (Beneficial Plants, barn owl, pheromone traps)</td></tr> </tbody> </table>	Type of Waste	Method of Disposal	Reduction Action Plan	Scrap metal	Sold to Waste Manager	All scraps are sold to Waste manager	Used PPE (SW 410)	Sold to Waste Manager	Maintain and monitoring proper usage of PPE.	Spent Lubricant (SW305)	Sold to Waste Manager	To frequent service tractors to ensure no leakages.	Empty Chemical Container	Recycling by BRG Enterprise	Increase mowing IPM field (Beneficial Plants, barn owl, pheromone traps)	Yes
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7.3.2	<p>Mill's has listed and identified waste product Waste Management Action Plan 2024. The chemical wastes and other scheduled wastes are disposed through a DOE registered schedule waste disposal contractor namely (license schedule waste collectors – Edsha Solutions Sdn. Bhd).</p> <p>Ulu Bernam Optimill has competent person to handling Schedule Waste approved by Department of Environment Malaysia, Nik Jazrikel bin Johannis as "Certified Environmental Professional in Scheduled Waste Management (CePSWaM) on 7/10/2016, Ref.No.: CePSWaM/01295.</p> <p>All estate waste disposed as per waste management document title "SOP Schedule Waste Management" dated 09/04/2021 and described in described in document "Types of Waste Products and Method of Disposal 2024". Example sighted such collection of domestic waste from housing is done every 2 days, re-use of chemical container for premix activities according to the "Empty Chemical Containers" inventory, segregation is in practice at landfill is sighted at all estates. Waste as categorized in Scheduled Waste was disposed to the license contractors by DOE.</p>	Yes															

	<p>All the Schedule Waste being disposed as per Regulations, sample taken at Changkat Mentri Esttae as below:-</p> <table><tr><td>SW Code</td><td>SW 110</td><td>SW 305</td><td>SW 409</td><td>SW 410</td></tr><tr><td>Previous Disposal Date</td><td>20/3/2023</td><td>15/8/2023</td><td>25/1/2024</td><td>25/1/2024</td></tr><tr><td>Date generated after previous disposal</td><td>25/1/2024</td><td>25/10/2023</td><td>2/3/2024</td><td>2/3/2024</td></tr><tr><td>Recent disposal date</td><td>25/1/2024</td><td>25/10/2023</td><td>15/4/2024</td><td>15/4/2024</td></tr><tr><td>No. of days from date generated (days)</td><td>-</td><td>-</td><td>44</td><td>44</td></tr><tr><td>Latest generation of waste</td><td>2/3/2024</td><td>2/3/2024</td><td>2/5/2024</td><td>2/5/2024</td></tr><tr><td>Days from date generated (days)</td><td>118</td><td>118</td><td>57</td><td>57</td></tr><tr><td>Licensed Contractor</td><td>Edsha Solutions Sdn Bhd</td><td>SP Metro (M) Sdn Bhd</td><td colspan="2">Edsha Solutions Sdn Bhd</td></tr></table>	SW Code	SW 110	SW 305	SW 409	SW 410	Previous Disposal Date	20/3/2023	15/8/2023	25/1/2024	25/1/2024	Date generated after previous disposal	25/1/2024	25/10/2023	2/3/2024	2/3/2024	Recent disposal date	25/1/2024	25/10/2023	15/4/2024	15/4/2024	No. of days from date generated (days)	-	-	44	44	Latest generation of waste	2/3/2024	2/3/2024	2/5/2024	2/5/2024	Days from date generated (days)	118	118	57	57	Licensed Contractor	Edsha Solutions Sdn Bhd	SP Metro (M) Sdn Bhd	Edsha Solutions Sdn Bhd		
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7.3.3	Wastes are disposed as per waste management action plan 2024. Company's Commitment on "zero burning" is stated in the UPB Environment and Biodiversity Policy. The policy was signed by company CEO Dato" Carl Bek-Nielsen, dated 8/3/2021 to compliance to Zero Burning policy (1989). There is no evident sighted during site visit on fire being used for waste disposal.	Yes																																								
7.4.1	<p>The company has established Standard Operating Procedures Oil Palm Field Practices to established the Good Agriculture Practices (GAP) related to management of soil fertility objectively to optimise yield and minimise environmental impacts includes:</p> <ul style="list-style-type: none">• Nursery Operations• Replanting• Upkeep Mature/Immature• Drains• Road and Path• Boundaries• Oil Palm Disease Management• Manuring Immature/Mature Oil Palm• Harvesting & Collection• Oil Mill RSPO Supply Chain• Protection of River Reserves (Riparian & Buffer Zone)• Internal Audit	Yes																																								

	All estates will receive fertilizer recommendation by the UP-Research Department (UPRD) based on foliar and soil analysis on annual basis. Sighted "Year 2024 Fertilizer Recommendation for Ulu Bernam Estate" dated 9/9/2023 by the Research department. The recommendation has identified year planted, soil type, Ha, Palm per Ha, Actual total palm, programme – which month and what fertilizer for the period of Feb – Sept 2024 for mature area, and January – December 2024 for immature.	
7.4.2	<p>Tissue and soil sampling is done once a year. Latest leaf analysis was done on 24/5/2024 for Ulu Bernam estate, 4-13/1/2023 for Lima Blas estate as sighted from 'Commercial Leaf Analysis Data 2023' report prepared by Mr. Ho Shui Hing, Director of Research UP. Annual fertilizer inputs had been monitored through fertilizer recommendations made by the UP-Research Department (UPRD).</p> <p>Sighted for Charong Estate, Leaf Analysis report analyze on 7/4/2023, Major nutrient and trace nutrient has been identified and this will reflect into fertilizer program for the period of 10/4-11/5/2023.</p> <p>While for Changkat Mentri Estate, Leaf Analysis report was last analyzed on 18/3/2023, Major nutrient and trace nutrient has been identified and this will reflect into fertilizer program for the period of 20/3-25/4/2023.</p>	Yes
7.4.3	<p>POME produce by the mill is used for land application in Ulu Bernam Estate. Record POME application maintained by the mill. Sighted record for land application of POME at Ulu Bernam Estate. The POME to replace potassium, moisture retention and as supplement from inorganic fertilizer. As of May 2024, total of 117,475.23 Mt of POME applied on total of 330.69 Ha.</p> <p>Empty Fruit Bunch were applied in Estates as recorded below:-</p> <ul style="list-style-type: none"> - <u>Lima Blas Estate</u> Record of EFB mulching is made available. For 2024, up until May 2024, total of 163.06 Mt for 6.52 ha as per target of 25 Mt/ha. - <u>Charong Estate</u> Management have applied EFB to its field as recycling strategy and records of application are maintained by the estate management. For the month January – May 2024, estate has applied approximately 13,459.58 Mt of EFB to its 336.46 ha of their area. - <u>Changkat Mentri Estate</u> Record of EFB mulching is made available. For 2024, up until May 2024, total of 8,081.41 Mt for 156.89 ha. As for POME, 1,700.00 m³ of POME applied on total of 39.50 Ha. 	Yes
7.4.4	Annual fertilizer inputs had been monitored through fertilizer recommendations made by company's research department. Record of fertilizer application maintained by the Estate. Sample record as follows:-	Yes



	<p>a. Ulu Bernam Estate</p> <table><tr><td>Date: 9/1/2024 Field No.: 60 Ha: 57.50 Ha Type of fertilizer: NK Dosage: 3.0 kg/ Palm Total applied: 22.50 Mt</td><td>Date: 1/4/2024 Field No.: 63 Ha: 16.35 Ha Type of fertilizer: Urea Dosage: 0.9 kg/ Palm Total applied: 2.97 Mt</td></tr><tr><td colspan="2">Date: 1/6/2024 Field No.: 44 Ha: 25 Ha Type of fertilizer: NK Dosage: 1.0 kg/ Palm Total applied: 3.83 Mt</td></tr></table> <p>2. Lima Blas Estate</p> <table><tr><td>Date: 02/1/2024 Field No.: Field 2/2007 Ha: 23 Ha Type of fertilizer: UP Comp Dosage: 2.9 kg/ Palm Total applied: 7.38 Mt</td><td>Date: 20/4/2024 Field No.: 11/2009 Ha: 74 Ha Type of fertilizer: MOP Dosage: 1.1 kg/ Palm Total applied: 11.45 Mt</td></tr><tr><td colspan="2">Date: 13/6/2024 Field No.: 17/2013 Ha: 94 Ha Type of fertilizer: RP Dosage: 0.5 kg/ Palm Total applied: 6.67 Mt</td></tr></table>	Date: 9/1/2024 Field No.: 60 Ha: 57.50 Ha Type of fertilizer: NK Dosage: 3.0 kg/ Palm Total applied: 22.50 Mt	Date: 1/4/2024 Field No.: 63 Ha: 16.35 Ha Type of fertilizer: Urea Dosage: 0.9 kg/ Palm Total applied: 2.97 Mt	Date: 1/6/2024 Field No.: 44 Ha: 25 Ha Type of fertilizer: NK Dosage: 1.0 kg/ Palm Total applied: 3.83 Mt		Date: 02/1/2024 Field No.: Field 2/2007 Ha: 23 Ha Type of fertilizer: UP Comp Dosage: 2.9 kg/ Palm Total applied: 7.38 Mt	Date: 20/4/2024 Field No.: 11/2009 Ha: 74 Ha Type of fertilizer: MOP Dosage: 1.1 kg/ Palm Total applied: 11.45 Mt	Date: 13/6/2024 Field No.: 17/2013 Ha: 94 Ha Type of fertilizer: RP Dosage: 0.5 kg/ Palm Total applied: 6.67 Mt		
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7.5.1 (C)	<p>Soil surveys and topographic maps, including the identification of steep terrain, were available. Soil series available in soil maps at:</p> <p>1. <u>Ulu Bernam Estate</u></p> <ul style="list-style-type: none">- The estate has established soil map identifying types of soil. The estates soil consists of Binjai Series, Bria Series, Bungor Series, Gondang Series, Gugut Series, Sabrang Series, and Selangor Series.- There no marginal, fragile soils and there is no steep terrain within the estate; over 90 % is flat land and about 1 % is 5-meter slop. <p>2. <u>Lima Blas Estate</u></p>	Yes								



- Sighted soil map for the estate identifying 7 types soil established in 2005 and review last in year 2018 without any changes. Soil identified include Chempaka series, Bungor series, Colluvial Deposit, Batu Lapan series, Seremban series, Serdang series, and Binjai series.

- Sighted slope classes for Lima Blas estate as below:

Slope degree	Description	Hectarage
2-6	Undulating	1,306.9
6-12	Rolling	1,248.3
12-20	Hilly	120.2
20-25	Steep	64.6
>25	Very steep	-
	Urban Land	148.9
	Total	2,888.90

- Sighted estate topographic map sheet No. 3659 L7030 series published in 1990 by Jabatan Ukur & Pemetaan Malaysia. Highest slope within the estate (127-meter height and the slope is in the category of 12-20 degrees) is located at field No.6 and during field visit to the site noted oil palm trees are planted by terracing.

3. Charong Estate

- Merged of Erong Division and Chawang Division totalling 6,900.76 ha land. Sighted soil map for both Erong and Chawang which consists of 10 soil types and 8 types of soil respectively.
- There is about 636.1 Ha of peat soil planted with oil palm in Charong Estate as sighted estate area statement and map. No steep terrain within the estate; 88 % is level and undulating area and about 12% is rolling topography. Sighted slope classes for Charong estate as below:

Slope degree	Description	Chawang Div Hectarage	Erong Div Hectarage
0-2	Level	2,782.6	3,144.9
2-6	Undulating	-	169.6
6-12	Rolling	503.6	354.5
12-20	Hilly	-	-
20-25	Steep	-	-
>25	Very steep	-	-
	Total	3,286.2	3,669

4. Changkat Mentri Estate

- Soil map is established for identifying types of soil. Among the soil identified include Gondrong Series, Sabrang Series. Linau Series, Tepus Series, Batu Lapan Series and Bungor Series. There no marginal, fragile soils and there

	<p>is no steep terrain within the estate. Sighted slope classes for Changkat Mentri estate as below:</p> <table border="1"> <thead> <tr> <th>Slope degree</th><th>Description</th><th>Hectarage</th></tr> </thead> <tbody> <tr> <td>0-2</td><td>Level</td><td>1,653.2</td></tr> <tr> <td>2-6</td><td>Undulating</td><td></td></tr> <tr> <td>6-12</td><td>Rolling</td><td>890.8</td></tr> <tr> <td>12-20</td><td>Hilly</td><td>-</td></tr> <tr> <td>20-25</td><td>Steep</td><td>-</td></tr> <tr> <td>>25</td><td>Very steep</td><td>-</td></tr> <tr> <td></td><td>Urban Land</td><td>5.3</td></tr> <tr> <td></td><td>Total</td><td>2,549.30</td></tr> </tbody> </table>	Slope degree	Description	Hectarage	0-2	Level	1,653.2	2-6	Undulating		6-12	Rolling	890.8	12-20	Hilly	-	20-25	Steep	-	>25	Very steep	-		Urban Land	5.3		Total	2,549.30	
Slope degree	Description	Hectarage																											
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	Total	2,549.30																											
7.5.2	<p>A management strategy for purpose of planting on slopes above a certain limit is evident in Standard Operating Procedures Oil Palm Field Practices; No. 2.0 Replanting; 2.4.11 Terracing – Where the terrain ranges from rolling – hilly to steep with gradient from 6 to 20°, contour terraces should be constructed at an average horizontal interval of 7.9 meters as guided by FFM – B 1.1.9.</p> <p>There is no steep terrain within the Ulu Bernam Estate; over 90 % is flat land and about 1 % is 5-meter slop.</p> <p>As for Lima Blas Estate, verification of soil map and site visit no area with >22° slope steep is planted with Oil Palm. The area is under conservation area (Forest Reserve).</p> <p>Charong Estate is merger of Erong Estate and Chawong Estate totalling 6,900.76 ha land. Sighted soil map for both Erong Estate consists of 10 soil types and Sg. Chawang Estate consist 8 types of soil. There is no steep terrain within the estate; 88 % is level and undulating area and about 12% is rolling topography.</p> <p>There is no steep terrain within the Changkat Mentri Estate. The land are identified as 65% level and 35% rolling.</p>	Yes																											
7.5.3	There is no new planting for the estate as verified from the RSPO NPP process and field verification. Oil palm age profile shows recent planting years is for replanting as verified onsite. There is no expansion of the planting hectarage since last audit.	Yes																											
7.6.1 (C)	There is no marginal and fragile soil within all the estates. These oil palm plantations are well established for more than 50 years, not including various perennial agricultural crops planted prior. Cross reference with Indicator 7.5.1.	Yes																											
7.6.2	There is no marginal and fragile soil within the estates.	Yes																											
7.6.3	There is no new planting for the estate. Soil map prepared by company's research department and JUPEM's topographic map are available for the estate. There is no peat soil within the estate.	Yes																											
7.7.1 (C)	Changkat Mentri Estate, Ulu Bernam Estate and Lima Blas Estate has no peat soil. Charong Estate has two divisions namely Chawang Division and Erong Division. Chawang Division contains 296 Ha peat soil and Erong Division Contains 490 Ha. All the peats were already being planted with oil palm prior by year 2007. There is no new planting for the estate.	Yes																											



7.7.2	<p>Ulu Bernam, Lima Blas and Changkat Mentri Estate, there is no peat soil or new planting within the estate.</p> <p>Charong Estate has two divisions namely Chawang Division and Erong Division. Chawang Division contains 325.8 Ha peat soil and Erong Division Contains 310.3 Ha. All the peats were already being planted with oil palm prior by year 2007.</p> <p>Based on the survey area, the area was classified as flat terrain & predominantly with a slope class of < 5o. Sighted the peat mapping inventory map for 2 divisions namely Soil Map of Ladang Sungai Erong and Chawang. Peat depth varies from moderately deep to deep (sapric condition). Average peat depth Chawang Division 2 is 1.51 meter and Erong Division 1 is 2.43 meter.</p> <p>Sighted the latest email submission from Sustainability Manager dated 13/1/2023. The purpose of the email is to notify the RSPO Unit about the Peat inventory for the entire United Plantation Berhad.</p>	YES																																
7.7.3 (C)	<p>Ulu Bernam, Lima Blas and Changkat Mentri Estate, there is no peat soil or new planting within the estate.</p> <p>At Charong Estate, placement of subsidence probe located at the following area;</p> <ul style="list-style-type: none"> Sungai Erong: <ul style="list-style-type: none"> Field 25 (Piezometer 1). Field 23 (Piezometer 2). <p>Peat subsidence is monitored on quarterly and summarize in yearly basis. During site visit, there are 2 probes located at above stated fields. Sighted "Peat Subsidence Probe Quarterly Reading" prepared by Senior Research Manager Dr. Vijiandran J Rajah. Reading sighted as follow:</p> <table border="1" data-bbox="365 1094 1339 1707"> <thead> <tr> <th rowspan="2">Year</th><th colspan="2">Rate of Peat Subsidence per year</th></tr> <tr> <th>Sg. Erong (Field 23D)</th><th>Sg. Chawang (Field 28)</th></tr> </thead> <tbody> <tr> <td>2008</td><td>0</td><td>0</td></tr> <tr> <td>2009</td><td>3.05</td><td>3.73</td></tr> <tr> <td>2010</td><td>Probe had been removed / disturbed</td><td>Probe had been removed / disturbed</td></tr> <tr> <td>2011</td><td>Peat probe disturbed / passed down</td><td>Peat probe disturbed / passed down</td></tr> <tr> <td>2012</td><td>5.81</td><td>4.10</td></tr> <tr> <td>2013</td><td>4.47</td><td>3.11</td></tr> <tr> <td>2014</td><td>Peat probe disturbed. Replaced new</td><td>2.10</td></tr> <tr> <td>2015</td><td>3.90</td><td>Sedimentation occurred near probe due to fooding. Probe to be reinstalled in new area</td></tr> <tr> <td>2016</td><td>2.86</td><td>2.69</td></tr> </tbody> </table>	Year	Rate of Peat Subsidence per year		Sg. Erong (Field 23D)	Sg. Chawang (Field 28)	2008	0	0	2009	3.05	3.73	2010	Probe had been removed / disturbed	Probe had been removed / disturbed	2011	Peat probe disturbed / passed down	Peat probe disturbed / passed down	2012	5.81	4.10	2013	4.47	3.11	2014	Peat probe disturbed. Replaced new	2.10	2015	3.90	Sedimentation occurred near probe due to fooding. Probe to be reinstalled in new area	2016	2.86	2.69	YES
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	2017	3.04	Soil accumulation at peat probe. Relocation of probe
	2018	1.56	Peat probe was pulled out and cut
	2019	2.41	New probe placed at the same location
	2020	1.95	3.32
	2021	2.75	Probe disturbed 1.1
	2022	2.40	NIL
	2023	2.49	0.99
	15/6/2023	Probe removed due to replanting of peat area.	
	<p>Estate management has complied with the requirement of RSPO about the monitoring of subsidence at peat area. During the site visit to the peat area, found the subsidence pole was well maintained and the reading of subsidence is updated yearly.</p> <p>Due to replanting of the peat area, the probe was taken out to ensure the replanting process is smooth. The subsidence probes were planted back on 10/6/2024 for Subsidence Probe 1 & 2 after the replanting process is completed. The cage built around the probe to prevent for any disturbance.</p>		
7.7.4 (C)	<p>Ulu Bernam, Lima Blas and Changkat Mentri Estate, there is no peat soil or new planting within the estate.</p> <p>In Charong Estate, the piezometer has been installed at the collection drain and the monitoring of the water level is made on weekly and summarize on monthly basis. Sighted the record of water table monitoring for the year 2023 which was maintained by the estate management. The reading of water level is within the optimum level.</p> <p>Under paragraph 4.4.4 sub-section 1.4.4 Peat Cultivation / Management SOP 4.4 dated 31/03/2014, the water table level to be maintained between 0.40 meter to 0.60 meter.</p> <p>Water management plan as below;</p> <ul style="list-style-type: none">• Area of management.: Peat soil• Measures: Monitoring of water level by piezometer and drain on weekly basis. <p>Based on the SOP Peat Management, the construct / rehabilitate perimeter drains around the area to be planted. During site visit at the peat area, sighted the implementation of Field, Collection and Main drain in the constructed in the field.</p> <p>There is drainage map shows the management of the water flows and location of water gate. This map is available and sighted during the audit.</p>		YES



	During site visit, no evidence of blanket spraying is practice in all estates across the United Plantation Berhad and soft grasses were maintained in the field to maintain the vegetation cover in the field.																									
7.7.5 (C)	<p>Ulu Bernam, Lima Blas and Changkat Mentri Estate, there is no peat soil or new planting within the estate.</p> <p>At Charong Estate, the Company has prepared the Drainability Assessment report to compliance with indicator 7.7.5. Sighted the Drainability Assessment Report of selected United Plantation Berhad dated May 2019, prepared by Param Agricultural Soil Survey (M) Sdn. Bhd. Sustainability manager has emailed the Peat Drainability Assessment to RSPO secretariat on 29/7/2019 as part of compliance to RSPO requirement.</p> <p>Drainability assessment report was submitted on RSPO for Approval titled "Drainability Assessment Report of United Plantation Berhad's Charong Estate in Perak Darul Ridzuan, Malaysia" (Revision Report -2) dated 10/2/2022. The report was by RSPO as sighted from email correspondence from Ms. Devaladevi Sivaceyon (RSPO GHG Unit) to Mr. Lee Kian Wei of UP Sustainability department dated 18/3/2022 stating "Charong's DA report has been approved by reviewers".</p> <p>Replanting process on peat area is commenced on 03/09/2022 for field 25/102.4 Ha.</p> <p>There is no rewetted and under rehabilitation area in peat since planted for Charong Estate. However, from Peat Inventory reported to RSPO Secretariat, UPB's has total 221.15 Ha peat rehabilitation area for UIE Estate and Runtu Estate, both are not within this certification scope.</p>	YES																								
7.7.6 (C)	<p>Ulu Bernam, Lima Blas and Changkat Mentri Estate, there is no peat soil or new planting within the estate.</p> <p><u>Charong Estate</u></p> <p>Estate management has installed the piezometer at the collection drain and the monitoring of the water level is made on weekly and summarize on monthly basis. Sighted the record of water table monitoring for the year 2024 which was maintained by the estate management. The reading of water level is within the optimum level.</p> <p>Under paragraph 4.4.4 sub-section 1.4.4 Peat Cultivation / Management SOP 4.4 dated 31/03/2014, the water table level to be maintained between 0.40 meter to 0.60 meter in field, main & collection drain.</p> <p>Sighted monitoring record for month of May 2024 reading recorded as follow:</p> <table><tr><td>Division</td><td>Erong</td><td>Division</td><td>Chawang</td></tr><tr><td>Field No</td><td>Reading</td><td>Field No</td><td>Reading</td></tr><tr><td>Field 22</td><td>-10</td><td>Field 8</td><td>-35</td></tr><tr><td>Field 23</td><td>-10</td><td>Field 26</td><td>-25</td></tr><tr><td>Field 24</td><td>-15</td><td>Field 28</td><td>-20</td></tr><tr><td>Field 25</td><td>-15</td><td>Field 29</td><td>-15</td></tr></table>	Division	Erong	Division	Chawang	Field No	Reading	Field No	Reading	Field 22	-10	Field 8	-35	Field 23	-10	Field 26	-25	Field 24	-15	Field 28	-20	Field 25	-15	Field 29	-15	YES
Division	Erong	Division	Chawang																							
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Field 23	-10	Field 26	-25																							
Field 24	-15	Field 28	-20																							
Field 25	-15	Field 29	-15																							



	<p>The estate has established fire prevention and control plan as sighted from SOP No. Chapter V – Emergency Response Plan which described on firefighting facilities, emergency flow chart, etc.</p> <p>Sighted 'Emergency & Fire Drill Training' record dated 13/5/2024 delivered by the Estate ERT team, involving 33 workers. In addition, Firefighting at field training also has been provided to the workers on 11/5/2024, briefed by Mr. Punithan and Mr. Thiva involving 5 workers. Sighted the evidence of training attendance and pictures of the training.</p> <p>Fire Danger Rating System (FDRS) warning signs and system has been implemented as sighted at the entrance of Charong Estate near the guard post. The rating system risk level identified as follow:</p> <ol style="list-style-type: none"> 1. Low (Green) - zero rain fall for 0-13 days 2. Moderate (Yellow) - zero rain fall for 14-20 days 3. High (Orange) - zero rain fall for 21-30 days 4. Extreme (Red) - zero rain fall for more than 30 days <p>The indicator is fixed based on rain fall record.</p> <p>Fire patrol for the estate is done by Auxiliary police and watchman. United Plantation Berhad has established SOP for Peat Cultivation Management. The peat areas is managing as per Peat Cultivation / Management SOP 4.4 dated 31/3/2014.</p>	
7.7.7 (C)	<p>Ulu Bernam, Lima Blas and Changkat Mentri Estate, there is no peat soil or new planting within the estate.</p> <p><u>Charong Estate</u> Peatland conservation areas are absent in said estate. The peat moisture has been maintained & natural water regimes were monitored accordingly. Rehabilitation measures were demonstrated whereby the fire prevention plan & natural revegetation of both secondary/indigenous plants were sighted in this block.</p> <p>The peat moisture has been maintained & natural water regimes were monitored accordingly. Rehabilitation measures were demonstrated whereby the fire prevention plan & natural revegetation of both secondary/indigenous plants were sighted in this block.</p> <p>The estate has established emergency response flowchart in case of fire. The flow chart has been displayed on estate office notice board. There are also emergency contact numbers displayed on estate notice boards. Emergency response team headed by estate manager.</p> <p>Moreover, fire extinguishers located at strategic location of the estate. In addition, the estate has provides mobile water tank (1,400 litter capacity) equipped with firefighting equipment that can be towed by tractor to remote area of the estate to put out fire.</p>	YES



7.8.1	<p>Ulu Bernam Optimill has established 'Water Management Plan' identifying plan for peat soil, water for consumption, domestic water waste and palm oil mill effluent. There is additional water management plan which identified water management requirement for peat soil, water for consumption.</p> <p>Source of water for mill processes is from Sungai Bernam and pumped to water reservoir located at mil and the raw water then treated in its water treatment plant before used by the mill for its operation.</p> <p>Water supply for mill workers and staffs is from Ulu Bernam Estate, which is extracted from Bernam River and treated prior to supply to line site.</p> <p>Based on mill's water management plan. water supplied for human consumption to be monitored periodically. Water supplied to mill's line sites are supplied from water reservoir and analyzed for its quality as sighted from certificate of water quality analysis done by ChemVi Laboratory Sdn Bhd on monthly basis. Results are within limits set by MOH guideline for water quality. There are designated sampling points consist of incoming, outgoing and at the end of the final consumption. Water quality analysis report sighted include:</p> <table border="1" data-bbox="472 863 1230 1165"> <tr> <th>Ref. No.</th><th>LW/0424/0570 (9)</th><th>LW/0424/0570 (8)</th></tr> <tr> <td>Date Sampled</td><td>2/4/2024</td><td>2/4/2024</td></tr> <tr> <td>Parameters</td><td colspan="2">Result</td></tr> <tr> <td>pH</td><td>8.48 at 29°C</td><td>7.22 at 28.7°C</td></tr> <tr> <td>Free Chlorine</td><td>ND (<0.1)</td><td>ND (<0.1)</td></tr> <tr> <td>Aluminum</td><td>0.05</td><td>0.16</td></tr> <tr> <td>Turbidity</td><td>0.38</td><td>0.35</td></tr> <tr> <td>E. Coli</td><td>ND (<10)</td><td>ND (<10)</td></tr> </table> <p>The company has established 'Water Management Plan' identifying plan for peat soil, water for consumption, domestic water waste and palm oil mill effluent. There is additional water management plan which identified water management requirement for peat soil, water for consumption. In addition, the company has established water management plan SOP No. 4, 'Water Management Plan' dated 10/12/2007 identifying field water management.</p> <p><u>Ulu Bernam Estate</u></p> <p>Drinking water quality analysis report is as same mill's report as the water is for the mill line site is processed and supplied by the estate.</p> <p>Estate also does annual testing of inlet and outlet Ulu Bernam River water quality to monitor for any pollution from its operation. Sighted latest river water sampling done on 26/8/2023 & 1/9/2023. Water sampling is done for 6 points. The water sampling</p>	Ref. No.	LW/0424/0570 (9)	LW/0424/0570 (8)	Date Sampled	2/4/2024	2/4/2024	Parameters	Result		pH	8.48 at 29°C	7.22 at 28.7°C	Free Chlorine	ND (<0.1)	ND (<0.1)	Aluminum	0.05	0.16	Turbidity	0.38	0.35	E. Coli	ND (<10)	ND (<10)	Yes
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E. Coli	ND (<10)	ND (<10)																								



carried out UP Research department. Sighted summary report of river water analysis and there is no evidence of pollution reported. Sampled as below:

Test Parameter	Watergate 12	River along border – Departing
pH value	6.40	6.6
BOD, mg/L	8	8
COD, mg/L	39	34
Suspended Solid	26	16
O&G	<1	<1
Dissolve	5.60	6.1
Ammoniacal Nitrogen	<0.05	<0.05
E-coli	<1	<1
WQI	61.01	62.81
Water Quality Class	III	III

Lima Blas Estate

The estate has changed the water for drinking sources to Municipal source (SYABAS) on January 2024. Thus, no water quality analysis has been conducted.

Estate also does annual testing of inlet and outlet Bernam River water quality to monitor for any pollution from its operation. Sighted latest river water sampling done on 29/9/2023. Water sampling is done for 6 sampling points. The water sampling carried out by UP Research department. Sighted summary report of river water analysis and there is no evidence of pollution reported.

Test Parameter	Main Drain Outlet	Main Bridge Sg. Bernam
pH value	6.3	6.5
BOD, mg/L	12	11
COD, mg/L	58	51
Suspended Solid	15	10
O&G	<1	<1
Dissolve	3.9	5.80
Ammoniacal Nitrogen	<0.05	<0.05
E-coli	<1	<1
WQI	56.69	58.81
Water Quality Class	III	III

Charong Estate

The estate monitors its drinking water quality of its line site use. Results are within limits set by MOH guideline for water quality. Below is the latest water analysis report sighted:

- Lab Tested: Chemvi Laboratory Sdn Bhd
 Lab Report No: LW/0624/1006
 Date Sampled: 11/06/2024



	<p>Sampling Description: Drinking water</p> <table> <tr> <th>Test Parameter</th><th>Test Results</th><th>MOH Req.</th></tr> <tr> <td>Turbidity</td><td>0.22</td><td>5</td></tr> <tr> <td>pH</td><td>6.95</td><td>6.5 – 9.0</td></tr> <tr> <td>TDS</td><td>93</td><td>1000</td></tr> <tr> <td>Ammonia</td><td>0.31</td><td>1.5</td></tr> <tr> <td>Nitrate</td><td>1.10</td><td>10</td></tr> <tr> <td>Iron</td><td>0.30</td><td>0.3</td></tr> <tr> <td>Aluminium</td><td>0.05</td><td>0.2</td></tr> <tr> <td>E-coli</td><td>ND (<10)</td><td>-</td></tr> <tr> <td>Coliform</td><td>ND (<10)</td><td>-</td></tr> <tr> <td>Free Chlorine</td><td>0.23</td><td>0.2 – 5.0</td></tr> </table> <p><u>Changkat Mentri Estate</u> The estate monitors its drinking water quality of its line site use. Results are within limits set by MOH guideline for water quality.</p>	Test Parameter	Test Results	MOH Req.	Turbidity	0.22	5	pH	6.95	6.5 – 9.0	TDS	93	1000	Ammonia	0.31	1.5	Nitrate	1.10	10	Iron	0.30	0.3	Aluminium	0.05	0.2	E-coli	ND (<10)	-	Coliform	ND (<10)	-	Free Chlorine	0.23	0.2 – 5.0	
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7.8.2 (C)	<p>Ulu Bernam Estate has no river runs within the estate. Ulu Bernam river runs along outside of the estate boundary at field no 12. During field visit sighted estate has created buffer zone and warning sign board erected prohibiting no spraying, no manuring, and no hunting along the zone.</p> <p>The estate monitors the riparian zone on monthly basis as sighted from latest inspection done on 4/6/2024 as recorded in "HCV/Conservation Area Monitoring Checklist"</p> <p>Based on the HCV assessment report, Lima Blas Estate, Charong Estate and Changkat Mentri Estate has no river runs across the estates.</p>	Yes																																	
7.8.3	<p>The mill has a valid DOE license [JAS.ATI.600-3/1/22] validity period of 1/7/2023 to 30/6/2024 which regulated as below:</p> <ol style="list-style-type: none"> 1. Mill effluent shall discharge the POME as per the final discharge plan #NPOM/501/15A title "P&I Diagram and Final Discharge Point" dated 24/6/2016 and "Layout of Furrow Irrigation System" dated on the same date. 2. Final discharge point shall be label with "Final Discharge" signage. 3. Monitoring of final discharge physically by periodically. 4. Limit of BOD (3 days@30 degrees) not exceed than 5,000 mg/L. No by-pass is allowed. 5. Pond deep is to maintain 0.50 m freeboard from original plan. 6. Performance Monitoring for effluent system to covered: <ol style="list-style-type: none"> i. Influent and effluent flowrate. ii. Parameters for analysis iii. Date and time of discharge iv. Total Suspended quantity v. Record of maintenance. 	Yes																																	



	<p>Effluents are treated using 8-ponds system. Final discharge is channeled to land irrigation at the Ulu Bernam Estate. Final discharge of mills effluent BOD level is monitored on monthly basis. Sighted last 5 months’ record from Independent Testing Laboratory, Chemvi Laboratory Sdn Bhd as follow:</p> <table><tr><th>Sampling Date</th><th>Outgoing BOD</th><th>Incoming BOD</th></tr><tr><td>7/5/2024</td><td>6</td><td>5</td></tr><tr><td>2/4/2024</td><td>3</td><td>8</td></tr><tr><td>12/3/2024</td><td>5</td><td>7</td></tr><tr><td>20/2/2024</td><td>14</td><td>17</td></tr><tr><td>19/1/2024</td><td>9</td><td>14</td></tr></table> <p>BOD parameter below is below DOE permissible limit of 5,000 mg/L.</p>	Sampling Date	Outgoing BOD	Incoming BOD	7/5/2024	6	5	2/4/2024	3	8	12/3/2024	5	7	20/2/2024	14	17	19/1/2024	9	14							
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7.8.4	<p>Mill monitors its water usage on monthly basis. Records of mill water usage recorded as per tonne of FFB processed. As per interview with the mill engineer, the optimum target for water usage is within the range of 1.50 – 2.50 liter per Mt/FFB. Following is the random data sample taken for year 2024:</p> <table><tr><th></th><th>FFB (Mt)</th><th>Water (l)</th><th>Mt/FFB</th></tr><tr><td>Jan</td><td>27,280.62</td><td>56,357</td><td>2.07</td></tr><tr><td>Feb</td><td>33,593.14</td><td>73,761</td><td>2.20</td></tr><tr><td>March</td><td>39,340.23</td><td>77,104</td><td>1.96</td></tr><tr><td>April</td><td>38.911.86</td><td>76,200</td><td>1.96</td></tr><tr><td>May</td><td>40,460.98</td><td>84,384</td><td>2.08</td></tr></table>		FFB (Mt)	Water (l)	Mt/FFB	Jan	27,280.62	56,357	2.07	Feb	33,593.14	73,761	2.20	March	39,340.23	77,104	1.96	April	38.911.86	76,200	1.96	May	40,460.98	84,384	2.08	Yes
	FFB (Mt)	Water (l)	Mt/FFB																							
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7.9.1	<p>The mill monitors its diesel and petrol usage on monthly basis. Sighted record of monitoring diesel usage against per ton FFB processed for year 2023 - 2024. The company has also had biogas plant which contributes to use of renewable energy which directly able to reducing the usage of fossil and more efficient manner. Sample record of diesel usage from year 2023 and as at May 2024:</p> <table><tr><th colspan="5">Diesel & Petrol Usage Forecast Comparison 2023 & 2024</th></tr><tr><th>UB Optimill</th><th>2023</th><th>Forecast 2023</th><th>As at May 2024</th><th>Forecast 2024</th></tr><tr><td>Diesel</td><td>62,845</td><td>128,400</td><td>27,815</td><td>130,500</td></tr><tr><td>Petrol</td><td>4,280</td><td>17,120</td><td>1,631</td><td>17,400</td></tr></table> <p>The plan for improving efficiency of the use of fossil fuels and to optimise renewable energy identified in the environmental action plan includes follow:</p> <ul style="list-style-type: none">• Closely monitoring of vehicle through Workshop Supervisor updating the vehicle maintenance record.• Ensuring consistent supply of power from turbine and biogas engine to mill operation and line site. <p>All the estates audited monitors its diesel usage on monthly basis. The objective of the usage monitoring is to reduce the usage (where possible) and improving the efficiency of the usage of fossil fuel. Sighted record of monitoring diesel usage against per ton FFB produced for year 2023. Main usage of fossil fuel such diesel is</p>	Diesel & Petrol Usage Forecast Comparison 2023 & 2024					UB Optimill	2023	Forecast 2023	As at May 2024	Forecast 2024	Diesel	62,845	128,400	27,815	130,500	Petrol	4,280	17,120	1,631	17,400	Yes				
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	<p>for tractor, locomotive and vehicles. Among the management plan to improve the fuel efficiency such as regular maintenance of the vehicle/tractors. Example of record of fossil fuel usage sighted for year 2023 & 2024 include:</p> <table><tr><th colspan="5">Diesel Usage Forecast Comparison 2023 & 2024</th></tr><tr><th>Estate</th><th>2023</th><th>Forecast 2023</th><th>As at May 2024</th><th>Forecast 2024</th></tr><tr><td>Ulu Bernam</td><td>202,292</td><td>214,287</td><td>85,539</td><td>224,900</td></tr><tr><td>Lima Blas</td><td>299,419</td><td>222,900</td><td>133,902</td><td>214,800</td></tr><tr><td>Charong</td><td>545,470</td><td>342,083</td><td>1174,028</td><td>332,838</td></tr><tr><td>Changkat Mentri</td><td>145,838</td><td>225,080</td><td>61,361</td><td>127,536</td></tr></table> <table><tr><th colspan="5">Petrol Usage Forecast Comparison 2023 & 2024</th></tr><tr><th>Estate</th><th>2023</th><th>Forecast 2023</th><th>As at May 2024</th><th>Forecast 2024</th></tr><tr><td>Ulu Bernam</td><td>19,447</td><td>18,828</td><td>6,103</td><td>22,490</td></tr><tr><td>Lima Blas</td><td>4,254</td><td>2,972</td><td>1,821</td><td>2,864</td></tr><tr><td>Charong</td><td>24,958</td><td>24,038</td><td>9,885</td><td>20,340</td></tr><tr><td>Changkat Mentri</td><td>5,668</td><td>56,270</td><td>3,752</td><td>47,826</td></tr></table>	Diesel Usage Forecast Comparison 2023 & 2024					Estate	2023	Forecast 2023	As at May 2024	Forecast 2024	Ulu Bernam	202,292	214,287	85,539	224,900	Lima Blas	299,419	222,900	133,902	214,800	Charong	545,470	342,083	1174,028	332,838	Changkat Mentri	145,838	225,080	61,361	127,536	Petrol Usage Forecast Comparison 2023 & 2024					Estate	2023	Forecast 2023	As at May 2024	Forecast 2024	Ulu Bernam	19,447	18,828	6,103	22,490	Lima Blas	4,254	2,972	1,821	2,864	Charong	24,958	24,038	9,885	20,340	Changkat Mentri	5,668	56,270	3,752	47,826	
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7.10.1 (C)	<p>Based on the RSPO palm GHG Calculation sighted for period Jan-Dec 2023, GHG emission value for mill verified by the auditor. Data verified from actual record at Ulu Bernam Optimill is tally with the data reported in PalmGHG:</p> <ul style="list-style-type: none">• Total power generated by steam turbine exported to worker's housing and/or national grid: 14,557,510 kWh/yr (verified from electricity generation from Biogas Plant record).• Diesel: 62,845 L/yr (Verified from Fossil Fuel Usage record)• Petrol: 4,280 L/yr (Verified from Fossil Fuel Usage record).• EFB Production: 96,865 Mt/year (verified from EFB record in Monthly Progress Report) with 87,179 Mt went for boiler as fuel, and 9,686 Mt went for mulching for Upriver Estates.• Mill Influent produced: 221,766 m³/Year.	Yes																																																												



	<p>As for Estate, the GHG emission identified in the EIA. The reduction plan identified in the environmental action plan includes follow:</p> <ul style="list-style-type: none"> • Apply fertilizer according to UPRD Recommendation • Do not apply nitrogenous fertilizers when flooded • Do not overfill the furrow 	
7.10.2 (C)	There is no new planting for all the estate since 2014.	Yes
7.10.3 (C)	<p>Mill's polluting activities has been assessed during Environmental Aspect and Impact Assessment and management plan as sighted latest revision on June 2024. Mitigation measures are identified for in the Environment Impacts Assessment register to prevent or minimize pollution. For example:</p> <ul style="list-style-type: none"> • Mill's domestic waste treated through twice a week collection, and waste segregation was done at landfill before disposal. Recyclable item will be sold to contractor for recycling. • Mill's EFB to be burn as fuel in boilers and distributed to estates as mulching. • Noise pollution is treated by installing sound damping where possible. <p>Estate's polluting activities has been assessed during Environmental Aspect and Impact Assessment as sighted from Sighted Environmental Management Plan (EMP), mitigation measures are identified in the Environment Impacts Assessment register to prevent or minimize pollution. For example:</p> <ul style="list-style-type: none"> • All estates has identified mitigation measures to reduce pollution through recycling biomass to field (EFB & POME) and reduction of inorganic fertilizer. • Hazardous wastes are disposed as scheduled wastes as identified in the estate's Waste Management Plan. 	Yes
7.11.1 (C)	<p>UPB has the policy and committed to Zero Burning as stated in the UPB Environment and Biodiversity Policy. The policy was signed by Dato" Carl Bek-Nielsen, dated 8/3/2021 to compliance to Zero Burning policy. UPB has replanting procedure under its GAP which prohibits use of fire for clearing old palm trees. The land preparation is done by for felling and chipping.</p> <p>At Ulu Bernam Estate, last replanting programme completed on March 2022 for Field No. 21 (4 Ha) as sighted from the "Field Planting Report".</p> <p>Site visit to replanting area at Lima Blas Estate & Charong Estate shows no evidence fire been used for replanting. As all the felled palm were chipped at certain size to allow for decomposing throughout years</p>	Yes
7.11.2	<p>The mill has established emergency response flowchart in case of fire. The flow chart has been displayed on mill notice boards situated in office and another mill workstation. There are also emergency contact numbers displayed on mill notice boards. Mill's Emergency response team headed by Resident Engineer. Beside fire hydrant system, the mill has fire extinguishers located at strategic location of the mill for fighting purpose. Sighted record of Fire Drill Exercise conducted by Mill Management</p>	Yes



	<p>The company has established emergency response flowchart in case of fire. The flow chart has been displayed on Estate & Mill Office notice board. There are also emergency contact numbers displayed on Estate & Mill notice boards. Emergency response team headed by estate manager. Beside fire extinguishers located at strategic location of the Estate & Mill, a mobile water tank (5,000 litter capacity) equipped with firefighting equipment that can be towed by tractor to remote area of the estate to put out fire.</p> <p>Sighted record of Fire Drill Exercise and ERP for fire outbreak training has been conducted by Estates Management; as sighted in Changkat Mentri estate was last conducted on 19/4/2024 involving 6 and 26 participants respectively.</p>											
7.11.3	Fire prevention and control measures are discussed with stakeholders during external stakeholder meetings which was conducted on 25/4/2024.	Yes										
7.12.1 (C)	<p>There is no new planting since 2005 for all the estate except for the replanting. Verified the age profile for all estates as below:</p> <table><tr><th>Name of the Supply Base</th><th>Age Profile</th></tr><tr><td>Ulu Bernam Estate</td><td>2002, 2003, 2004, 2005, 2006, 2007,2009, 2012, 2014, 2015, 2016, 2017, 2018, 2019, 2022</td></tr><tr><td>Lima Blas Estate</td><td>1996, 1998, 2000, 2001, 2002, 2005, 2006, 2007, 2009, 2012, 2013, 2014, 2015, 2018, 2023, 2024</td></tr><tr><td>Charong Estate</td><td>2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2013, 2014, 2016, 2017, 2023, 2024</td></tr><tr><td>Changkat Mentri Estate</td><td>1998, 1999, 2000, 2001, 2002, 2004, 2008, 2009, 2013, 2014, 2018, 2019, 2020, 2022</td></tr></table>	Name of the Supply Base	Age Profile	Ulu Bernam Estate	2002, 2003, 2004, 2005, 2006, 2007,2009, 2012, 2014, 2015, 2016, 2017, 2018, 2019, 2022	Lima Blas Estate	1996, 1998, 2000, 2001, 2002, 2005, 2006, 2007, 2009, 2012, 2013, 2014, 2015, 2018, 2023, 2024	Charong Estate	2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2013, 2014, 2016, 2017, 2023, 2024	Changkat Mentri Estate	1998, 1999, 2000, 2001, 2002, 2004, 2008, 2009, 2013, 2014, 2018, 2019, 2020, 2022	YES
Name of the Supply Base	Age Profile											
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Charong Estate	2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2013, 2014, 2016, 2017, 2023, 2024											
Changkat Mentri Estate	1998, 1999, 2000, 2001, 2002, 2004, 2008, 2009, 2013, 2014, 2018, 2019, 2020, 2022											
7.12.2 (C)	<p>Sighted "Conservation Assessment of United Plantation's Perak Estates" being conducted on Complex Basis by Wilds Asia's Sdn Bhd dated 14/1/2008. The assessment was conducted by Dr. Reza Azmi as team leader and his team.</p> <p>The assessment report has recommended following:</p> <ol style="list-style-type: none">1. All the riverine reserve a designated as conservation reserve.2. Sign board to be erected strategically.3. Control assesses by outsider. <p>Sighted the HCV Management Plan implemented by Estate management;</p> <ol style="list-style-type: none">1. To erect proper signboard at strategic point along the boundary to these areas to prevent illegal activities; hunting & trespassing.2. Spraying of agrochemicals and manuring activities are not allowed.3. To monitor on monthly basis for soil erosion, pollution, sign of illegal activities, spraying / manuring, signage and new sightings of ERTs, etc.	YES										



	<p>4. Regular briefing/programme to be conducted for all workers on the status of RTE.</p> <p>5. To issue warning letter to internal stakeholders if found out any intrusion or hunting found in the HCV/conservation area. For external stakeholder, the management shall lodge police report on such misbehaviour.</p> <p>In addition, the HRESH Department has conducted self-assessment lead by Mr. Lee Kian Wei for HCV/Conservation Area on 14/10/2020 for Ulu Bernam Estate. There is 13.65 Ha identified as HCV 4 and there is present of RTE species jungle trees is planted alongside the riparian as self-initiative for restoration. The Ulu Bernam estate is surrounded with its own estates Changkat Mentri Estate (United Plantation) and Sg. Samak Estate (Sime Darby).</p> <p>Awareness program on High Conversation Value has been carry out by the estate management to 4 employees dated 15/5/2024 at Ulu Bernam Estate.</p> <p>For Lima Blas Estate, HRESH Department has conducted in-house HCV Assessment on 18/08/2020. The assessment study does not indicate presence of any HCV or RTE species however based on the latest observation, there were several common animal species sighted during the daily operations such as Crab Eating Macaque. Verified these species in the IUCN red list online portal as Endangered.</p> <p>Based on the monitoring of flora and fauna species, there is no RTE species habitat in the reserve jungle. The management has decided to set-aside the reserved jungle (99 Ha) as self-declared conservation area to protect the green scenery.</p> <p>Sample identified of Rare Tree Species planted in the Lima Blas Estate as follows;</p> <ol style="list-style-type: none"> 1. <i>Diospyros diepenhostii</i> 2. <i>Angothis barneensis</i> 3. <i>Cynometra ramiflora</i> 4. <i>Shorea leprosula</i> 5. <i>Shorea collina</i> 6. <i>Aquilaria malaccensis</i> <p>As a part of management monitor plan, the estate continues to monitor its HCV/Conversation areas. Sighted record of latest such monitoring was done on 20/06/2024 from "HCV/Conversation Area Monitoring Checklist" which shows there is no soil erosion, encroachment, hunting, chemical spray, manuring or any pollution.</p> <p>Awareness program on High Conversation Value has been carry out by the estate management to all employee dated 8/5/2024 at Lima Blas Estate.</p>	
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	<p>Sighted also Wildlife Monitoring Checklist last conducted on 24/6/2024, observer sighted long tail monkey. Short tail macaque, and dusky leaf monkey.</p> <p>At the Charong Estate, self-assessment lead by Mr. Lee Kian Wei for CV/Conservation Area on 14/10/2020. The assessment study does not indicate presence of any HCV or RTE species in the estate.</p> <p>Sighted Changkat Mentri Estate in-house HCV assessment dated on 14/08/2020. The in-house HCV Assessment has identified Grut Wildlife Sanctuary and Magaretha Hill as self-conservation area and Lembah Bernam Archaeological Site as HCV 6. Participatory mapping has been conducted and 0.04 ha of HCV 6 area and 13.22 ha of self-declared conservation area being identified. Sighted the HCV Management Plan implemented by Estate management:</p> <ul style="list-style-type: none"> ➤ Grut Wildlife Sanctuary & Magaretha Hill: <ol style="list-style-type: none"> 1. Erect proper signboard at strategic point along the boundary to these areas to prevent illegal activities, eg: hunting and trespassing. 2. Spraying of agrochemicals and manuring activities are not allowed. 3. To monitor on monthly basis for soil erosion, pollution, signs of illegal activities, spraying/manuring, signages, new sightings of ERTs. Etc. ➤ Lembah Bernam Archaeological Site (HCV 6): <ol style="list-style-type: none"> 1. Maintain & monitoring the surrounding condition from intrusion. 2. Provide access to any interested stakeholders such local communities, statutory bodies, researcher etc. 3. Erect proper signboard at relevant areas to prevent illegal activities. <p>Sighted HCV/ Conservation Area Monitoring Checklist last conducted on 13/6/2024, observer sighted junglefowl. There is no erosion, encroachment, hunting, chemical spraying, manuring and other pollution found in the area.</p> <p>During field visit, noted that the recommendation is implemented by the estate management.</p>	
7.12.3 (C)	There is no new planting since 2005 for all the estate except for the replanting.	N/A
7.12.4 (C)	<p>Below is the management plan maintain by the all estates for the HCV and Conservation Area available in UPB's estate compound. Most estate have similar Management Plan as below:</p> <ol style="list-style-type: none"> 1. To erect proper signboards at strategic points along the boundary to these area(s) to prevent illegal activities, eg: hunting and trespassing. 2. Spraying of agrochemicals and manuring activities are not allowed. 3. To encourage planting of jungle trees in these area(s). 4. To monitor on monthly basis for soil erosion, pollution, signs of illegal activities, spraying/manuring, signages, new sightings of ERTs, etc. 5. Regular briefing/programme to be conducted for all workers on the status of ERT. 	N/A



	<p>6. If there is any intrusion or hunting found in the HCV/conservation area, the Estate management shall issue warning letter to the internal stakeholders as an internal disciplinary measure. If there are any external stakeholders carry out illegal intrusion in the estate concession, the Estate management shall lodge police report.</p> <table><tr><td>Estates</td><td>HCV/Conservation area</td></tr><tr><td>Ulu Bernam Estate</td><td>HCV 4 – 13.65ha riparian zone of Sungai Bernam</td></tr><tr><td>Lima Blas Estate</td><td>99ha of self-declared conservation area</td></tr><tr><td>Charong Estate</td><td>Nil</td></tr><tr><td>Changkat Mentri Estate</td><td>HCV 6 – 0.04ha of archaeological site & 13.22 ha of self-declared conservation area</td></tr></table>	Estates	HCV/Conservation area	Ulu Bernam Estate	HCV 4 – 13.65ha riparian zone of Sungai Bernam	Lima Blas Estate	99ha of self-declared conservation area	Charong Estate	Nil	Changkat Mentri Estate	HCV 6 – 0.04ha of archaeological site & 13.22 ha of self-declared conservation area	
Estates	HCV/Conservation area											
Ulu Bernam Estate	HCV 4 – 13.65ha riparian zone of Sungai Bernam											
Lima Blas Estate	99ha of self-declared conservation area											
Charong Estate	Nil											
Changkat Mentri Estate	HCV 6 – 0.04ha of archaeological site & 13.22 ha of self-declared conservation area											
7.12.5	There is no new planting since 2005 for the estate. The estate was planted with oil palm since 1927. There is no HCV identified were involved rights of local communities.	N/A										
7.12.6	<p>All the estates have a copy of the HCV assessment report and the management plan is developed and maintain by the relevant estate management. The main target for the management plan is to protect and enhance the presence of the RTE species within the compound. Sighted all estates has well implemented the plan by in term of documentation (policy, report and records) and implementation on the ground (refer finding 7.12.2 above).</p> <p>Programme to regularly educate the workers is evidence by all estates from their annual training programme. As evidence, at Ulu Bernam Estate sighted the “HCV & Conservation Awareness Training” is planned on October 2023. Last previous training was conducted on 15/05/2024.</p>	Yes										
7.12.7	<p>As a part of management monitor plan, the estate continues to monitor its HCV/Conversation areas. Sighted record of latest such monitoring was done on 10/6/2024 from “HCV/Conversation Area Monitoring Checklist” which shows there is no soil erosion, encroachment, hunting or chemical spray. This is including the monitoring of the RTE species and record of any animals sighting by workers that shall be reported to the management.</p> <p>There were several common animal species sighted during the daily operations such as Crab eating macaque, and lizard. The species have verified these species in the IUCN red list online portal and fall under least concern species. Based on the criteria guideline of HCV, RTE species has been found at the forest jungle, therefore the area has been managed according to the RTE species management plan to protect and conserve the wild life and endangered species in the estate.</p>	YES										
7.12.8 (C)	There is no new planting since 2005 for the estate. The estate was planted with oil palm since 1927.	N/A										

5.0 Details of Nonconformities and OFI identified during this assessment

5.1 Major Nonconformities: No Major NC's being raised in this audit.

5.2 Minor Nonconformities: No Minor NC's being raised in this audit.

5.3 Opportunity for Improvement

No OFI being raised during this audit

5.4 Non-conformity Raised from the Previous Year, if applicable

This section gives an over view of new or revised non-conformities raised during this audit and of action taken to close out non-conformities raised during the previous audits, if applicable.

If a minor-non-conformity raised at the last audit, is not closed out, then this will be raised to Major status and the company given 90 days to close this out. In this case, upgraded NC will appear in section 5.1 above.

No Minor Non-Conformity has been raised in previous audit year. Therefore, this indicator is not applicable.

5.5 Noteworthy positive Components

1	Excellent commitment and cooperation especially from Upper and Middle Management.
2	Good relationship being maintained with surrounding smallholders and villages.
3	Good positive feedback received from internal and external stakeholders.
4	Good awareness noted during interview with local and foreign workers on forced labor, retention of passport, discrimination in any form (race, gender, religious), grievance mechanism and basic wages.
5	There are good efforts and financial allocation for workers quarters (refurbishing / repair works).
6	Interview with gender committee head, and worker's Representative reveals all the visited site's management very co-operative and transparent.



6.0 Summary of GHG Emissions

Important Note:

All audit beginning 1st January 2020 must use PalmGHG Version 4 to show compliance to Criteria 7.10.1 of RSPO P&C 2018. The desktop application is now ready for use at

<https://www.rspo.org/certification/palmghg/palm-ghg-calculator>

All information and data below can be retrieved from the summary report generated through PalmGHG Calculator.

Summary of Net GHG Emissions

Emissions per Product	tCO ₂ e/tProduct
CPO	1.04
PK	1.04

Extraction	%
OER	21.60
KER	4.51

Production	t/yr
FFB processed	451,881.59
CPO Produced	97,241.00
CPK Produced	20,138.53

Land use	Ha
OP planted area	17,393.81
OP planted on peat	1,250.06
Conservation (forested)	240.00
Conservation (non forested)	0.00
Total	18,643.87

	Own Crop		Group		3rd Party		Total
	tCO ₂ e	tCO ₂ e /tFFB	tCO ₂ e	tCO ₂ e /tFFB	tCO ₂ e	tCO ₂ e /tFFB	
Emissions							
Land Conversion	153,267.81	0.35	0.00	0.00	0.00	0.00	153,267.81
*CO ₂ Emissions from Fertiliser	32,640.66	0.07	0.00	0.00	0.00	0.00	32,640.66
**N ₂ O Emissions - Peat	6,673.30	0.02	0.00	0.00	0.00	0.00	6,673.30

**N2O Emissions - Fertilizer	21,530.58	0.05	0.00	0.00	0.00	0.00	21,530.58
Fuel Consumption	4,059.38	0.01	0.00	0.00	0.00	0.00	4,059.38
Peat Oxidation	48,674.03	0.11	0.00	0.00	0.00	0.00	48,674.03
Sinks							
Crop Sequestration	-145,283.28	-0.63	0.00	0.00	0.00	0.00	-145,283.28
Conservation Sequestration	-1,378.89	0.00	0.00	0.00	0.00	0.00	-1,378.89
Total	120,183.59	0.27	0.00	0.00	0.00	0.00	120,183.59

Summary of Mill Emissions and Credits

	tCO2e	tCo2e/tFFB
Emissions		
<i>POME</i>	5,271.17	0.01
<i>Fuel Consumption</i>	258.02	0.00
<i>Grid Electricity Utilisation</i>	0.00	0.00
Credits		
<i>Export of Grid Electricity</i>	-5,065.58	-0.01
<i>Sales of PKS</i>	-1023.13	0.00
<i>Sales of EFB</i>	0.00	0.00
Total	-559.51	0.00



Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0%
Divert to anaerobic - digestion	100%

POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	0%
Divert to methane capture - (flaring)	8%
Divert to methane capture - (electricity generation)	92%



7.0 Acknowledgement

7.1 Date of Surveillance Assessment Visit

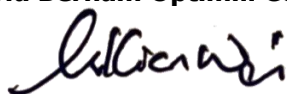
The next annual surveillance assessment visit will be scheduled 9-12 months of the RSPO Certificate being issued.

7.2 Confidentiality

GGC auditors will not discuss or reveal any of the confidential information seen during the audit to any third party. Any public summary of the audit report will be acknowledged by the client prior to publication.

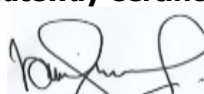
7.3 Signing of Report

Signed for on behalf of
Ulu Bernam Optimill Complex



.....
Name : Lee Kian Wei
Role : Sustainability Manager
Date : 12/07/2024

Signed for on behalf of
Global Gateway Certifications Sdn. Bhd



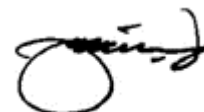
.....
Name : Ismadi bin Ismail
Role : GGC Lead Auditor
Date : 12/07/2024

7.4 Signing by the Certifier

I the undersigned, being the Certifier, confirm that the information and conclusions included in this report have been prepared in good faith and that the certification decision has been based upon this information.

Acknowledged by:

Name:	Muhammad Syafiq bin Abd Razak
Position:	Certifier
Date:	16/07/2024



Signature

Annex 1 – Audit Agenda (actual on site)

AGENDA				
Date	Location	Subjects	Lead Auditor	Auditor
23/6/2024 (Sunday)	Travelling day for auditors to hotel (client to advise)			
24/6/2024 (Monday)	UP – Ulu Bernam Estate	0830 – 0900: Opening meeting for UP - Optimill Complex Introduction by Lead Auditor	IBI	OAS, BS NZZ
		0900 – 1700: Document review <ul style="list-style-type: none"> Document review [EIA, SIA, CIP, Business Plan] Complaint mechanism / Request & respond. Best agricultural practices Safety and Health Last year NC (s) verification – if applicable Site verification <ul style="list-style-type: none"> Best agricultural practices Manuring, Spraying, Harvesting, HCV / Conservation Area Legal compliance / boundary Chemical / Pesticide / Fertilizer Stores Worker’s interview Worker’s facilities (housing, pay, etc.) 	IBI	OAS, BS NZZ
25/6/2024 (Tuesday)	UP – Lima Blas Estate	0900 – 1700: Document review <ul style="list-style-type: none"> Document review [EIA, SIA, CIP, Business Plan] Complaint mechanism / Request & respond. Best agricultural practices Safety and Health Last year NC (s) verification – if applicable Site verification <ul style="list-style-type: none"> Best agricultural practices Manuring, Spraying, Harvesting, HCV / Conservation Area 	IBI	OAS, BS NZZ



		<ul style="list-style-type: none"> Legal compliance / boundary Chemical / Pesticide / Fertilizer Stores Worker's interview Worker's facilities (housing, pay, etc.) 		
26/6/2024 (Wednesday)	UP – Ulu Bernam Optimill	<p>0900 – 1700: Document review</p> <ul style="list-style-type: none"> Document review [EIA, SIA, CIP, Business Plan] Complaint mechanism / Request & response. Legal Requirements Best Practices & OSH Last year NC (s) verification – if applicable <p>1100 – 1300: Supply Chain Certification Assessment of the POM (RSPO SCC)</p> <ul style="list-style-type: none"> Demonstration of legal entity Roles and responsibility Procedures/manual/SOP Record of purchase – RSPO certified product Record of sales– RSPO certified product <p>Site verification</p> <ul style="list-style-type: none"> Mill inspection Workshops Stores POM application Safety and Health / PPE / Signage Waste Management / Environment Worker's interview Stakeholder consultation if required. RSPO SCC site implementation. 	IBI	OAS, BS NZZ
27/6/2024 (Thursday)	UP – Charong Estate	<p>0900 – 1700: Document review</p> <ul style="list-style-type: none"> Document review [EIA, SIA, CIP, Business Plan] Complaint mechanism / Request & response. Best agricultural practices Safety and Health Last year NC (s) verification – if applicable <p>Site verification</p> <ul style="list-style-type: none"> Best agricultural practices Manuring, Spraying, Harvesting, 	IBI	OAS, BS NZZ



		<ul style="list-style-type: none"> • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / Fertilizer Stores • Worker's interview • Worker's facilities (housing, pay, etc.) 		
28/6/2024 (Friday)	UP – Changkat Mentri Estate	<p>0900 – 1530: Document review</p> <ul style="list-style-type: none"> • Document review [EIA, SIA, CIP, Business Plan] • Complaint mechanism / Request & response. • Legal Requirements • Best Practices & OSH • Last year NC (s) verification <p>Site verification</p> <ul style="list-style-type: none"> • Chemical / Pesticide / Fertilizer Stores • Workers interview • Worker's facilities (housing, pay, etc) <p>15:00 – 16:00: Preparation for closing meeting - UP – Changkat Mentri Estate.</p> <ul style="list-style-type: none"> • Additional field visits and meetings with managers as necessary. • Verify any outstanding issues, auditor discussion. <p>16:00 – 17:00: Closing meeting</p> <ul style="list-style-type: none"> • Presentation of findings by the audit team • NC closure dateline (if any) • Questions and answers • Final summary by team leader <p>End of assessment</p>	IBI	OAS, BS NZZ

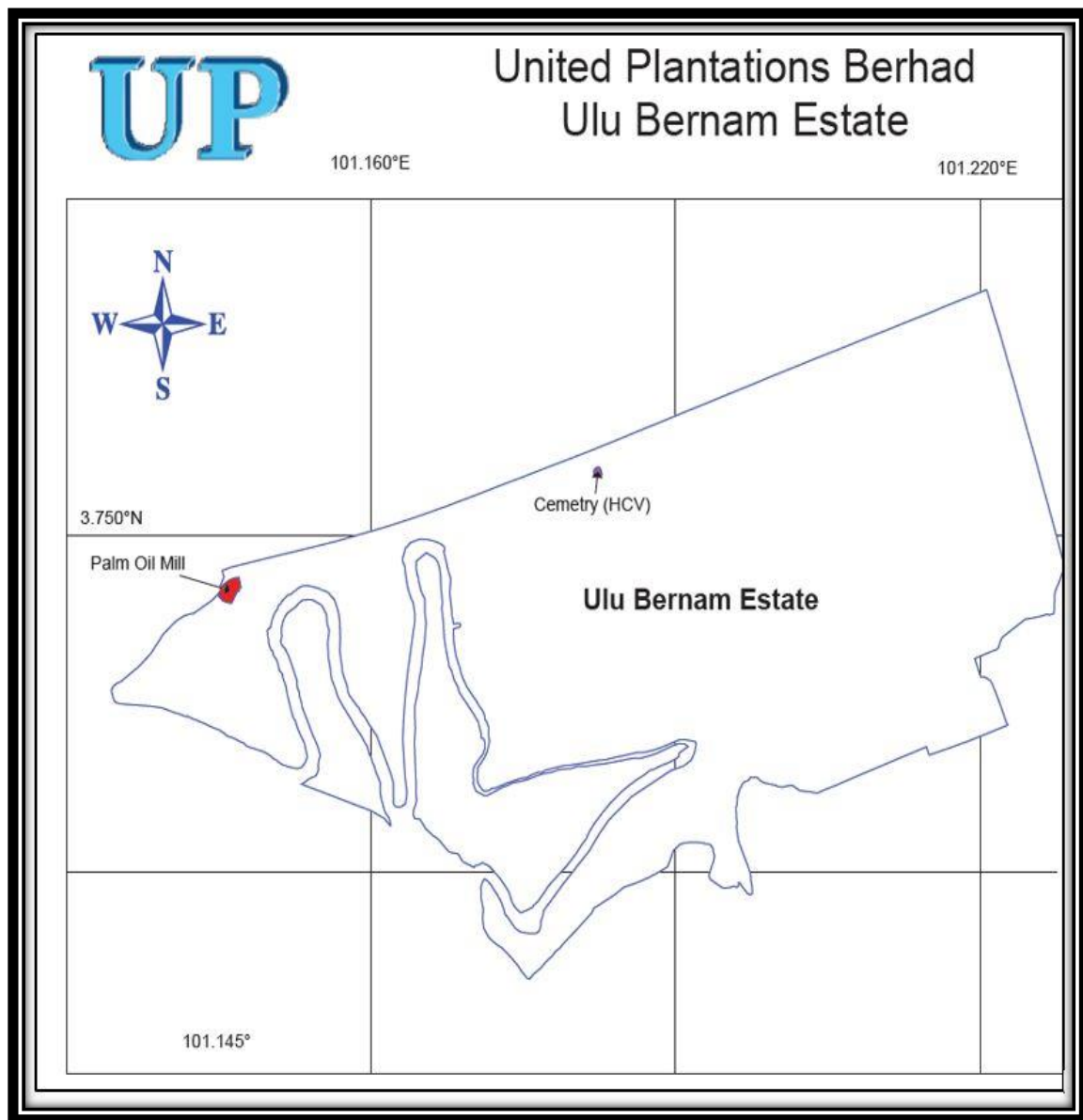


Annex 2 – Maps

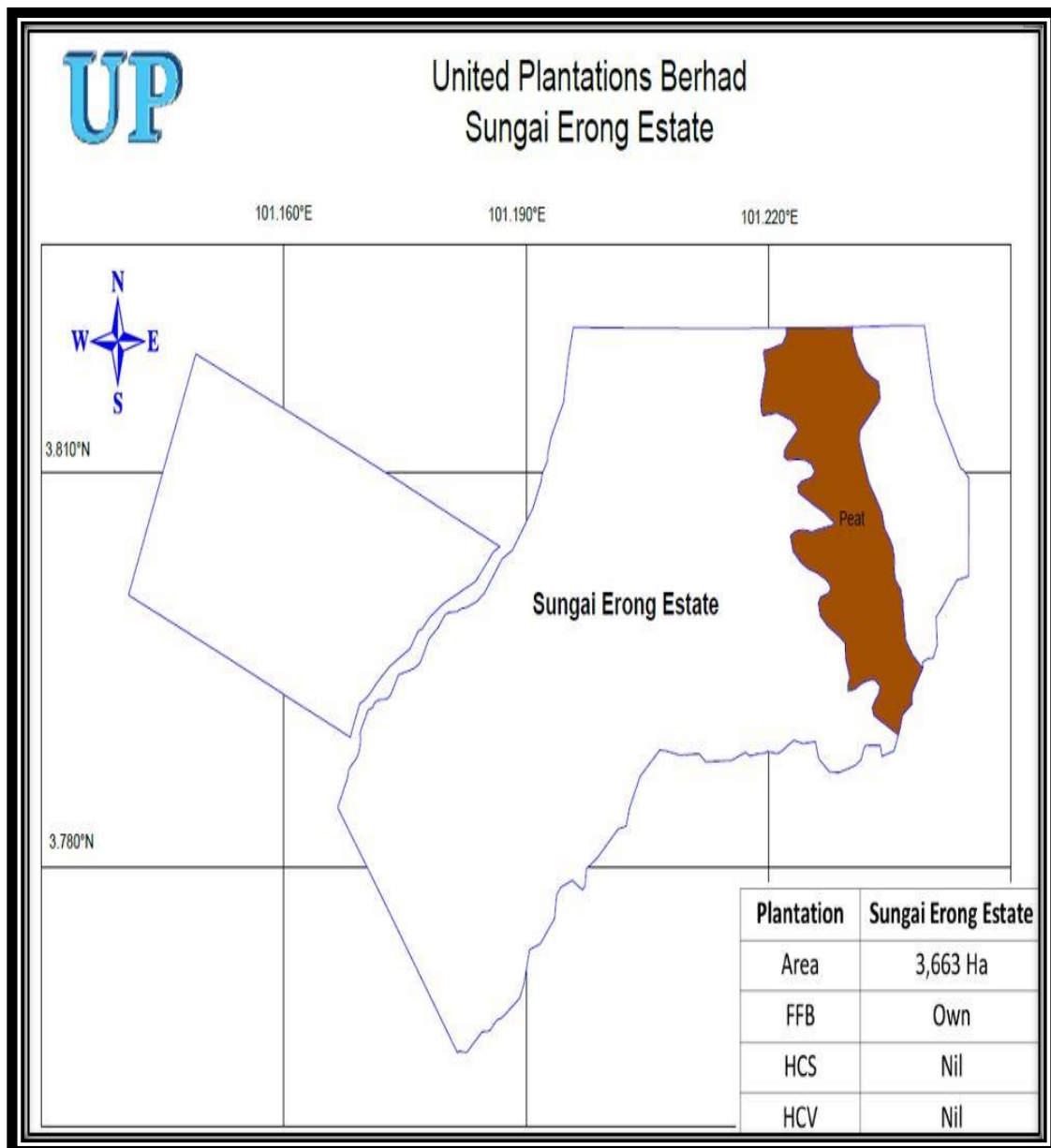
1) Ulu Bernam Optimill



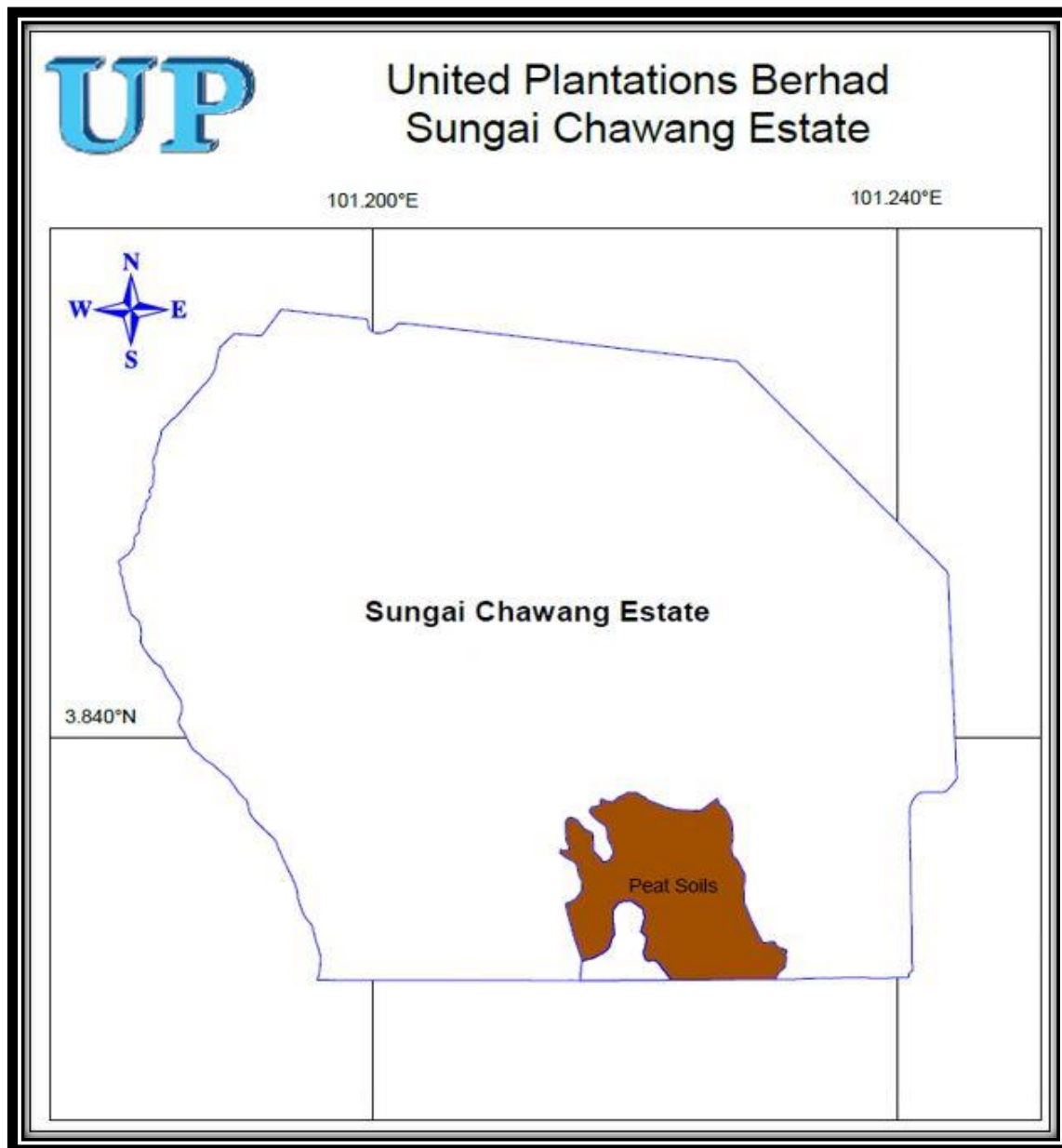
2) Ulu Bernam Estate



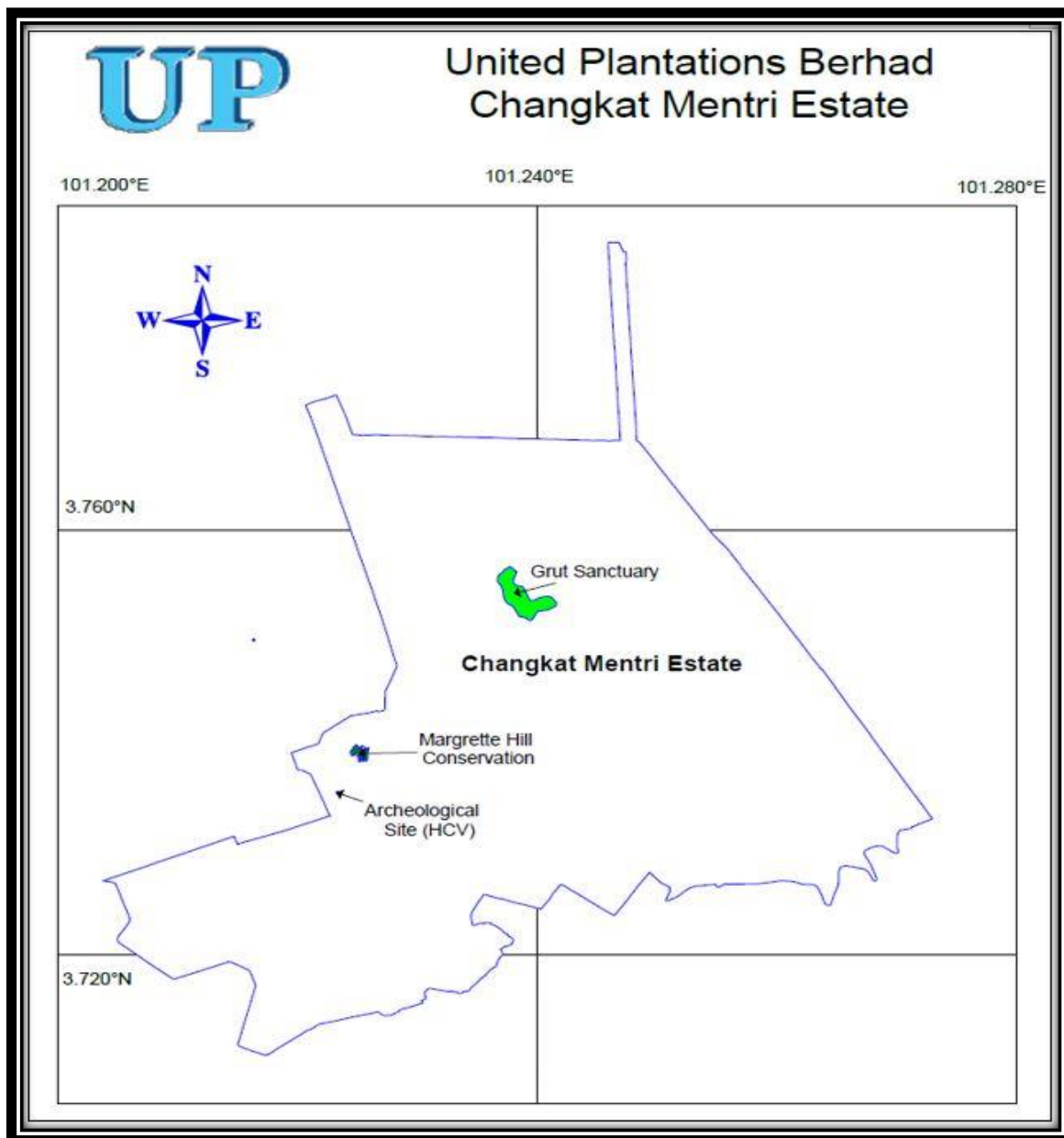
3) Charong Estate – Sungai Erong Division



4) Charong Estate – Sungei Chawang Division



5) Changkat Mentri Estate



6) Lima Blas Estate

