



2024

RSPO PRINCIPLES & CRITERIA (PUBLIC SUMMARY REPORT)



ANNUAL SURVEILLANCE AUDIT 2-2

Malaysia

ULU BASIR PALM OIL MILL
(United Plantations Berhad)

11th – 13th June 2024

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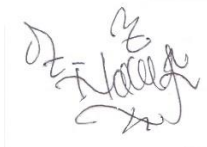
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Audit Process Steps

Audit Planning completed	07/06/2024
Field audit completed	13/06/2024
Draft report completed	20/06/2024
Final report completed	10/07/2024
Report sent to Certifier	20/06/2024
Report sent to External Peer Reviewer	N/A
Certification Decision	11/07/2024
First Certification Decision	29/09/2012

Prepared & Signed by Lead Auditor



Name : Hendra Fachrurozy

Position : GGC Lead Auditor

Date : 10/07/2024



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1.0 Executive Summary

1.1 Objective, Audit Methodology, Certification Scope and Recommendation

Objective of Certification Assessment

United Plantations Berhad (UPB) has, over the years, grown in size and stature to emerge as one of the larger plantation groups in Malaysia and listed in the Main Board of the Bursa Malaysia. The Company principle business activity is the cultivation of oil palm and coconut and the processing of their products. Its subsidiary companies are engaged in several downstream activities such as specialty fats, soap products and trading in crude palm oil. The Company has, from a modest beginning in 1906, grown in size and stature. It presently has a total of 11 oil palm plantations in Malaysia and Indonesia (9 in Malaysia and 2 in Indonesia) covering approximately 62,513 hectares. Of which oil palm plantations cover 46,227 hectares and coconut 4,627 hectares. Besides cultivation, UPB also operates 5 (five) palm oil mills (four in Malaysia and one in Indonesia), a refinery (Unitata Bhd) and a joint venture refinery (UniFuji Sdn. Bhd).

In Malaysia, UPB plantations are located in Perak and Selangor, while in Indonesia they are located in Central Kalimantan. In Malaysia, all 4 palm oil mills process FFB from UP's own RSPO certified plantations. As per the Engineering head, all UP's mills run on green energy produced by their own biomass boilers and biogas plants. In Indonesia, the 60 MT/hour palm oil mill processes from UPB's own plantation as well as from associated smallholders and independent plantations. UPB have over 8000 hectares of set aside conservation areas within our Malaysian and Indonesian operations. UPB possesses considerable know-how in plant breeding, agronomy and tissue culture through its R&D facilities for the development of new and improved planting materials as well as improved crop husbandry practices. Through its sound managerial and technical expertise, UPB is today recognized as one of the highest yielding, cost competitive and innovative companies in Malaysia.

Global Gateway Certifications Sdn. Bhd. [hereafter known as GGC] has conducted the Annual Surveillance Audit (ASA 22) of UP - Ulu Basir Complex [hereafter known as UPUBPOM] from 11th June to 13th June 2024 by 4 auditors to assess the compliance of the certification unit against the RSPO P&C Certification Systems 2020, RSPO SCC System Documents 2020, the RSPO Principles and Criteria 2018 – Malaysia National Interpretation (MYNI Nov 2019).

Based on the FFB database and stakeholder list, found the UPUBPOM receives FFB from UP own estate(s) that are RSPO certified and audited based on IP supply chain module. During this audit, interviewed with mill and estate managers, field staff, estate, and mill workers (local and foreigners).

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 taken into account in the assessment.



Certification Scope Methodology

The approach to the audit was to treat the UPB, Ulu Basir POM and its supply bases as an 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 and 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 is only 01 (One) internal supply base supplying FFB to UPUBPOM, therefore sampling of supply base is not applicable.

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.

Sampling Matrix UP – Ulu Basir Complex (2018 - 2024)

YEAR			2018	2019	2020	2021	2022	2023	2024
No.	Name of the supply base(s)	Site Address	ASA1	ASA2	ASA3	ASA4	RC	ASA2-1	ASA2-2
1	Ulu Basir Estate	Up River Business Unit, 36500 Ulu Bernam, Perak, Malaysia.	x	x	x	x	x	x	x

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 UPUBPOM. The estate and mill managers respectively in charge and ensures that respective operating units 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 interviewed employees are aware of the requirements of RSPO.

This report will be internally reviewed prior to certification decision by GGC's Certifier. During this audit, the audit team found a full compliance of the complex that being audited. Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted with no major nor minor non-conformity finding, therefore, the lead auditor recommends United Plantations – Ulu Basir POM to be continued with RSPO P&C certification.



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 Unit

No	Name Of The Mill	Site Address	Mill's Capacity	Supply Chain Model	GPS Reference of the site office	
					Longitude	Latitude
1.	Ulu Basir POM	Up River Business Unit, 36500 Ulu Bernam, Perak, Malaysia	60	IP	E 101° 15' 21"	N 03° 43' 28"

No	Name Of The Supply Base	Site Address	Age Profile	GPS Reference of the site office	
				Longitude	Latitude
1.	Ulu Basir Estate	Up River Business Unit, 36500 Ulu Bernam, Perak, Malaysia	2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016 & 2017	E 101° 25' 36"	N 03° 72' 45"



1.4 Production Area, Actual and Projected FFB, CSPO & CSPK Production (MT)

Name Of The Supply Base	Area Summary (HA)		
	Land Title	Planted	Mature
Ulu Basir Estate	3,990.80	3,737.49	3,737.49
Total	3,990.80	3,737.49	3,737.49

Name Of The Supply Base	Area Summary (HA)		
	Conservation Area	HCV	Others
Ulu Basir Estate	129.48	0	123.83
Total	129.48	0	123.83

Name of The Supply Base	FFB Summary (MT)		
	Projected from last audit [June 2023 - May 2024]	Actual Production for 12 Months [June 2023 - May 2024]	Projected Production for next 12 Months [June 2024- May 2025]
Ulu Basir Estate	110,000.00	105,254.88*	110,000.00

Note :

*Ulu Basir estate is dispatching FFBs to Ulu Basir POM and Ulu Bernam POM

	Projected from last audit [June 2023- May 2024]	Actual Production for 12 Months [June 2023- May 2024]	Projected Production for next 12 Months [June 2024- May 2025]**
FFB Summary (MT)	127,530.00	80,374.03*	115,000.00
CSPO Summary (MT)	28,694.00	17,362.42	26,450.00
CSPK Summary (MT)	6,376.00	3,679.55	6,325.00

Note :

*FFB received by Ulu Basir POM from Ulu Basir estate (56,619.23 MT) & other certified estates under UPB Group (Changkat Mentri estate(14,396.10 MT), Lima Blas estate (7,784.19 MT), Ulu Bernam estate (824.36 MT) & Charong estate (750.15 MT))

**There is a decrease of the projected production period of June 2024 to May 2025 if compared with the previous year because Ulu Basir POM is decreasing the allocation of FFB processed from Ulu Basir estate



1.4.1 Certified CSPO & CSPK Data:		
For 12 months' period [June 2023 – May 2024]	CSPO	CSPK
Last license year's certified produced	17,362.42	3,679.55
Last license year's actual sold volume	15,032.73	3,490.48
Last license year's actual sold CSPO credits (where applicable)	0.00	

Note :

There is opening stock on June 2023 for CSPO : 145.98 MT and for CSPK : 226.94 MT

1.4.2 Non-certified CPO & PK Data: all certified product		
Note: This section only for RSPO CSPO & CSPK produced but sold as others scheme		
For 12 months' period [June 2023 – May 2024]	CPO	PK
Last license year's actual sold volume	0.00	0.00

1.4.3 Non-certified CPO & PK Data: certified product		
Note: This section only for RSPO CSPO & CSPK produced but sold as non-certified		
For 12 months' period [June 2023 – May 2024]	CPO	PK
Last license year's actual sold volume	0.00	0.00

Non-Certified FFB Supplier (Excluded from Certificate)

Name Of The Supply Base	Site Address	FFB Summary (MT) [June 2023 – May 2024]
NIL	NIL	NIL

Remark: No non-certified FFB were received by this palm oil mill.



Scheme Smallholders/Scheme included in the certificate		Outgrowers/Independent		Smallholders/Outgrowers			
<input checked="" type="checkbox"/> 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	N.A
1.5.2	Are list of previous land owners and contact details available?		Please fill up table below	-	N.A
1.5.3	Were all the acquisitions done with a proper FPIC?		-	-	N.A
1.5.4	Are there any acquisition agreements available?		-	-	N.A
1.5.5	Were the acquisition agreements complied with?		-	-	N.A

List of previous land owners

OPP	Name	Year of acquisition	Contact details
NIL	NIL	NIL	NIL

Rmark : Land ownership by United Plantations 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
N.A	N.A	N.A

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)	$N = (0.8\sqrt{Y}) \times (z)$	Smallholders/outgrowers (S)	$N = (0.8\sqrt{S}) \times (z)$
1	1	N.A	N.A



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-UPBUB-RSPO-AA2-2019
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	13/07/2022 – 15/07/2022
Annual Surveillance 1 [ASA 21]	20/06/2023 – 22/06/2023
Annual Surveillance 2 [ASA 22]	11/06/2024 – 13/06/2024
Annual Surveillance 3 [ASA 23]	July 2025 – September 2025
Annual Surveillance 4 [ASA 24]	July 2026 – September 2026



2.0 Assessment Process

2.1 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: Hendra Fachrurzy (HF)

He is a seasoned forest management professional. He graduated from Bogor Agriculture University (IPB) in 2000. From 2002 to 2011, he served as a Junior Consultant.

In 2011, Hendra joined a leading certification body in Indonesia, where he held key roles including Manager for Agriculture Service (RSPO & ISPO scheme) and Lead Auditor. From 2022 to 2023, he worked as a Sustainability Manager and Senior Sustainability Trainer & Consultant. In 2024, he joined as Lead Auditor at Global Gateway Certifications Indonesia.

He has completed extensive training in areas like Internal Auditing, Project Management, Occupational Safety & Health, Timber Verification, and Sustainable Production Forest Management. His diverse experience and training highlight his expertise and dedication to sustainable forestry and agriculture practices. Able to speak and understand Bahasa Malaysia, English and Bahasa Indonesia.

Auditor 1

Name: Ismadi Bin Ismail (IBI)

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang with 25 years of working experiences with various plantation companies. Vast experiences, knowledge and skills in establishing new Estates from Jungle or Forest and Best Agriculture Practices (GAP) for plantation either peat or mineral.

He had been involved in MSPO 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, Endorsed RSPO P&C Lead Auditor Course in 2019 and ISO 9001:2015 Lead Auditor course by TOMC.

Apart from auditing, he is also certified MSPO Peer Reviewer by MPOCC since 2017. Able to speak Bahasa Malaysia and English.

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, incharge 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. Able to speak and understand Bahasa Malaysia and English.



Auditor 3

Name: Ahmad Syazwan Bin Mohd Shahar (SMS)

Graduated in Applied Chemistry from University Teknologi Mara Shah Alam with more than 10 years of working experiences in a plantation company in Malaysia. Having a skill in Good Milling Practices (GMP).

Attended and successfully completed the MSPO Lead Auditor course conducted on 2019. Successfully completed ISO9001:2015 Quality Management System Lead Auditor conducted on July 2021. Also, certified as Competent Person in Schedule Waste and Scrubber Operation.

Understanding in Industrial relation and labour law. Attended OSH Act 1994 & Regulations and Factories & Machinery Act 1967 & Regulations Training. Able to speak and understand Bahasa Malaysia and English.

Local Expert / Observers (If applicable)

Name: Muhd Jamalul Arif bin Hamid

Educational background in Plantation Management and Marine Cargo Surveying with working experience in handling Quality & Quantity cargo survey for agricultural products such palm oil, soybean, maize and sugar.

Also qualified and involved in sustainability and Management System (MS) auditing since 2011 for mostly sustainability schemes such RSPO, ISCC, MSPO, Global Gap, GMP, SMETA, ESCAS and second parties audit.

Involved in RSPO P&C, NEXT and SCCS conducted in Malaysia, Indonesia, Colombia, Ecuador, Ivory Coast, Papua New Guinea and Middle East Country.

Completed ISO 9001:2008 Lead auditor in 2011, trained in ISO 19011 & 17021 requirements in 2014, Social Skill Auditing Conversion against RSPO, MSPO, ETI & SEDEX requirements on 2015, RSPO P&C Lead Auditor Endorsed Course on 2013, 2016, 2019 & 2022, RSPO SCC Course on 2015 & 2021, MSPO Auditor Training on 2014 (3rd Batch) held by MPOB, MSPO SCCS Auditor Training on 2018, Basic Safety Training Course etc. Qualified ISCC Green House Gas (GHG) Expert and responsible for preliminary review ISCC system user GHG calculation for GGC. Able to speak and understand Bahasa Malaysia and English.

Peer Reviewer (if applicable)

Name: N/A



2.2 Stakeholder Consultation

During this annual surveillance audit (ASA 22), 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/consultation, 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 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.	Assessment team findings [Outcome]
1	Oil room operator, laboratorium staff, workshop & mechanic operator in POM	<ul style="list-style-type: none"> • They have attended some briefings so that they have a good understanding of policy and commitment owned by UP example UP policy, OSH commitment, labor commitment (covering human rights), etc • They have understood some relevant SOP's example consultation & communication procedure, compliance & grievance procedure, request & response procedure • They have joined more than 10 years • They have understood about PPE usage and PPE will be replaced when worn out, a minimum of wage, the content of information on pay slip and medical handling (estate clinic to hospital owned by company or government hospital if seriously or clinic can't handling), etc • Payslip has been received by employee 	No action requires	Positive findings



No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken.	Assessment team findings [Outcome]
		<ul style="list-style-type: none"> House has been provided by the company where there are 2 rooms, living room, toilet, kitchen, bathroom & locker for keeping employee passport (key of locker held by the employee). It is free of charge They have been provided with medical check-ups which are conducted twice annually At the current time, no complaints or grievances against the company 		
2	Harvesters	<ul style="list-style-type: none"> They have a good understanding of RSPO. They are aware on the existence of complaints and grievances mechanism. PPE is given free of charge by the Estate. They have confirmed that no sexual harassment and violence cases had happened in the workplace. They were satisfied with the condition of their living quarters. They have confirmed that wages per month are being paid more than the Minimum Wage Order 2022 of RM1500.00. 	No action requires	Positive findings
3	Water Treatment Plant Operator - Mill	<ul style="list-style-type: none"> Good understanding of RSPO Promptly attend to quarters repairs They have understood some relevant SOPs/mechanisms example consultation & communication procedure, compliance & grievance 	No action requires	Positive findings



No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken.	Assessment team findings [Outcome]
		<p>procedure, request & response procedure</p> <ul style="list-style-type: none"> • They hold their passport unless for permit renewal. • PPE given by company – free. • No discrimination and treated equally 		
4	Locomotive Driver	<ul style="list-style-type: none"> • Good understanding of RSPO and Policies. • They hold their passport unless for permit renewal. • PPE given by the company – free. • They signed the Contract Agreement upon arrival • No recruitment fees and recruited through the G-to-G programme • They have understood some relevant SOPs/mechanisms example consultation & communication procedure, compliance & grievance procedure, request & response procedure 	No action requires	Positive findings
5	Pruners – Newly Recruited Workers	<ul style="list-style-type: none"> • Undergone Induction Course on 10/6/2024 • No recruitment fee, UP reimburse passport fee RM245 • Received Kit allowance upon arrival RM150/Person. • They have signed the Contract Agreement with Management. • Recruited direct by UP at source country through Bangladeshi Govt. Programme 	No action requires	Positive findings



No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken.	Assessment team findings [Outcome]
		<ul style="list-style-type: none"> Have some basic understanding on the Contract Agreement signed with UP (Estate) and Company's Policy 		
6	Storekeeper	<ul style="list-style-type: none"> The shop has operated for more than 10 years. Management is monitoring the grocery price on a periodical basis Good cooperation by Management Aware of minimum wage Payslip has been received by the employee and understood about payslip content Salary on 28th of every months They have understood some relevant SOPs/mechanisms example consultation & communication procedure, complaint & grievance procedure, request & response procedure 	No action requires	Positive findings
7	Mosque Representative	<ul style="list-style-type: none"> Both mill and estate management were always helpful and contributed a lot to the Mosque activities. No discrimination among religious Has understood some policies and SOPs example UP policy, consultation & communication procedure, etc 	No action requires	Positive findings
8	Temple Representative	<ul style="list-style-type: none"> Both mill and estate management were always helpful and contributed a lot to the Temple activities. No discrimination among religious 	No action requires	Positive findings



No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken.	Assessment team findings [Outcome]
		<ul style="list-style-type: none"> Has understood about some policies and SOPs example UP policy, consultation & communication procedure, etc 		
9	School, SRJK (T) Ulu Bernam	<ul style="list-style-type: none"> They have a good relationship with the management. The management will provide any assistance, especially on the grass cutting of the school whenever they request. The management also provided free transport for the school children Has understood some policies and SOPs example UP policy, consultation & communication procedure, etc 	No action requires	Positive findings
10	Kiara Jubli Sendaran Berhad (Kiara Jubli estate)	<ul style="list-style-type: none"> No land conflict or other issues between Ulu Basir estate and Kiara Jubli estate and they have a good relationship He has understood about boundary between both estates because boundary pillars have been demarcated in the field He has understood that UP has a human rights policy No harassment or intimidation from Ulu Basir management to me and other parties FFB is dispatching to other POM 	No action requires	Positive findings
11	Weighbridge officer (2 persons)	<ul style="list-style-type: none"> They have participated in training provided by the company They understand with tasks/job and their responsibility including supply 	No action requires	Positive findings



No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken.	Assessment team findings [Outcome]
		chain roles, UP policy and some company commitments <ul style="list-style-type: none"> They have understood some relevant SOPs/mechanisms example consultation & communication procedure, compliance & grievance procedure, request & response procedure 		
12	Contractors for CPO transportation (4 companies)	<ul style="list-style-type: none"> The company has paid on schedule appropriate with the contract They have done CPO transport activities for a long time Renewal agreement/contract and payment process is fair or not any indication of corruption or not nepotism They have understood UP policy, some commitments owned by the company (including compliance to regulations related to employee issues), complaint & grievance mechanism, prohibited contaminating CSPO with oils from other parties or non-certified oils, etc There is an agreement/contract between the auditee and the transporter 	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

RSPO Member Name : United Plantations Bhd
 Membership No : 1-0004-04-000-00
 Category : Ordinary / Sector : Oil Palm Growers
 Country/Territory : 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	A time-bound plan for certifying all its management units and/or entities, including the units where the organisation has management control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.
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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 (5) years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year time frame. Any deviations from these maximum periods require approval by the RSPO Secretariat.
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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	Progress towards this plan shall be verified and reported in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB that first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness.
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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, including for the scheme smallholders and outgrowers, shall be reviewed by the CB. Changes to the time-bound plan are permitted only if the organisation can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment the company is legally registered with the local notary or chamber of commerce (or equivalent).

Summary

No any change of TBP on the current audit (year 2024) but any change of TBP on previous audit (year 2023). The detail of the justification of change for TBP per the current audit as follows :

- Still recovery period after Covid-19
- In progress in tandem with the issuance of land titles. The detail of informations as follows :
 - 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 Environmental 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.

Whereas, some requirements relate of the issuance of land titles has fulfilled by UPB if comparing with previous audit condition i.e :

- 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

UPB has demonstrated some evidences to supporting justification above

In Compliance



Yes



No



Not Applicable

RSPO Certifications Systems Requirements

Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. If there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;



Summary CB has not found isolated lapses in implementation or fundamental failure to proceed with implementation of the plan/

In Compliance ☒ Yes ☐ No ☐ Not Applicable

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 and HCS in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB.

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 49.572ha 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 KumaiArut 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 4.4, 4.5, 4.6, 4.7 and 4.8.

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 4.2.

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 the requirements 5.5.3 (a)–(d) above based on self-declarations by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach :

- A positive assurance statement is made, based upon self-assessment (i.e., internal audit) by the organisation or assessment carried out by an accredited CB. Evidence of the assessment against each requirement shall be demonstrated and if there is non-compliance whether the non-compliance has been actively addressed or communicated to RSPO
- Where applicable, targeted stakeholder consultation, including consultation with the relevant NGOs, will be carried out by the CB
- Desktop study e.g., web check on relevant complaints
- If necessary, the CB may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.



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) For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available

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) Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these certification systems

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

**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, without other supporting documentation, shall not be acceptable



Time Bound Plan for United Plantations Bhd

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification
				Latitude	Longitude			
Jendarata POM	Malaysia	Jendarata POM	Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak, Malaysia	3.853889° N	100.968333° E	Located in the managed area of Estate	Certified	Not Applicable
UIE POM	Malaysia	UIE POM	KM 9, Jalan Bruas-Ayer Tawar, 34900 Pantai Remis, Perak, Malaysia	4.448056° N	100.719722° E	Located in the managed area of Estate	Certified	Not Applicable
Ulu Bernam Optimill	Malaysia	Ulu Bernam Optimill	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	3.821944° N	101.220556° E	Located in the managed area of Estate	Certified	Not Applicable
Ulu Basir POM	Malaysia	Ulu Basir POM	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia.	3.724444° N	101.255833° E	Located in the managed area of Estate	Certified	Not Applicable
Jendarata Estate	Malaysia	Jendarata Estate	Jalan Kuala Selangor– Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak, Malaysia	3.9° N	100.9775° E	6,335.64	Certified	Not Applicable
UIE Estate	Malaysia	UIE Estate	KM 9, Jalan Bruas- Ayer Tawar, 34900 Pantai Remis, Perak, Malaysia	4.443889° N	100.722778° E	10,365.20	Certified	Not Applicable



Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification
				Latitude	Longitude			
Seri Pelangi Estate	Malaysia	Seri Pelangi Estate	Batu 11 ¾, Jalan Bidor, 36008 Teluk Intan, Perak, Malaysia	3.993611° N	101.159444° E	1,422.00	Certified	Not Applicable
Ulu Bernam Estate	Malaysia	Ulu Bernam Estate	Up River Bussiness Unit, 36500 Ulu Bernam, Perak, Malaysia	3.746111° N	101.148889° E	3,197.59	Certified	Not Applicable
Changkat Mentri Estate	Malaysia	Changkat Mentri Estate	Up River BussinessUnit, 36500 Ulu Bernam, Perak, Malaysia.	3.758333° N	101.24° E	2,550.53	Certified	Not Applicable
Charong Estate (Chawang & Erong)	Malaysia	Charong Estate (Chawang & Erong)	Up River BussinessUnit, 36500 Ulu Bernam, Perak, Malaysia.	3.803611° N	101.221667° E	6,900.76	Certified	Not Applicable
Lima Blas Estate	Malaysia	Lima Blas Estate	35800 Hulu Selangor, Selangor, Malaysia.	3.792222° N	101.351667° E	2,745.00	Certified	Not Applicable
Ulu Basir Estate	Malaysia	Ulu Basir Estate	Up River BussinessUnit, 36500 Ulu Bernam, Perak, Malaysia.	3.7243157° N	101.2535362° E	3,990.80	Certified	Not Applicable
Tanarata Estate (Newly acquired in 2019)	Malaysia	Tanarata Estate (Newly acquired in August 2019)	Batu 7, Jalan Changkat Jong, 36008 Teluk Intan,Perak	3.969722° N	101.096667° E	3,641.82	Certified	Not Applicable



Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification
				Latitude	Longitude			
Lada Estate	Indonesia	Lada Estate	Sungai Rangit Jaya Village, Pangkalan Lada Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province	2.493056° S	111.723056° E	713.47 + 3,250.95 = 3,964.42	Certified	Not Applicable
Runtu Estate	Indonesia	Runtu Estate	Runtu Village, Arut Selatan Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province	2.375278° S	111.689444° E	2,753.20	Certified	Not Applicable
Lada Estate (balance HGU)	Indonesia	Lada Estate	Sungai Rangit Jaya Village, Pangkalan Lada Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province	2.493056° S	111.723056° E	1,796.61 (HPK) + 215 (APL) + 46 (APL) + 12.26 (HGB) + 27.73 (Hak Pakai) = 2,097.60	Not Certified	2025
Runtu Estate (balance HGU)	Indonesia	Runtu Estate	Runtu Village, Arut Selatan Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province	2.375278° S	111.689444° E	4,491.40 (APL) + 130 (APL) + 4.60 = 4,626.00	Not Certified	2025



Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification
				Latitude	Longitude			
Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	Indonesia	Lada Estate (Plasma Lada, Runtu, Arut & Kumai)	Plasma Lada : Sungai Rangit Jaya Village, PangkalanLada Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province Plasma Runtu : Runtu Village, Arut Selatan Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province Plasma Arut : Medang Sari Villlage, Arut Selatan Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province Plasma Kumai : Sungai Bedaun Village, Kumai Sub-District, Kotawaringin Barat District, Kalimantan Tengah Province	Plasma Lada: 2.493056° S Plasma Runtu: 2.375278° S Plasma Arut: 2.503611° S Plasma Kumai: 2.623333° S	Plasma Lada: 111.723056° E Plasma Runtu: 111.689444° E Plasma Arut: 111.655833° E Plasma Kumai: 111.848056° E	833 (Hak Milik) + 431.88 (Hak Milik in progress) + 1.48 (HGB) + 1,115.82 (Hak Pakai) =	Not Certified	2025



Friday, May 26, 2023 at 14:34:39 Malaysia Time

Subject: Re: RSPO Time Bound Plan for United Plantations Berhad
Date: Friday, 26 May 2023 at 9:49:41 AM Malaysia Time
From: Certification Helpdesk
To: Lee Kian Wei
CC: Muhammad Shazaley bin Abdullah, amirul@rspo.org, cbn@plantations.biz, mbn@plantations.biz, mathewc6@gmail.com, Dr. Sanath, Faizzatul Nadia Nasir
Attachments: RSPO Time Bound Plan Revision Template - United Plantations Berhad (Approved 25.05.2023).xlsx, Time Bound Plan Revision Request - United Plantations Berhad (RSPO Approved on 25.05.2023).pdf

Dear Mr Lee,

Good day to you.

Please be informed that the RSPO Secretariat agreed with the proposed new timeline for certification under United Plantations Berhad.

Please note that this approval is subject to the fulfillment of related Time Bound Plan requirements stated in the RSPO Certification System documents by the RSPO Members. This approval email shall always be made available for the CB for verification purposes, and all supporting evidence for evaluation by the CB is still necessary to be provided by the RSPO Members. Kindly find attached the approved time bound plan for your perusal.

Please also note that United Plantations Berhad is responsible to update RSPO Secretariat should there be any new changes after this date of approval.

Thank you

M. Shazaley Abdullah

Head of Certification | **Roundtable on Sustainable Palm Oil**

T: +603 2201 4646 | W: www.rspo.org

For general enquiries, please visit [AskRSPO](#)

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.

The organization has got approval for the revision of time-bound plan for Lada estate (balance HGU), Runtu estate (lanace HGU) and Lada Estate (Plasma Lada, Runtu, Arut & Kumai). The new proposed for certification in three entities is year 2025.

United Plantations 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>UPB has established its policy on documents that can be assessed by the External as well as the Internal stakeholders dated 11th January 2014 approved by Dato Carl Bek Nielsen, Chief Executive Director.</p> <p>Further, UPB has also established Request and Response Procedure for request of documents by Internal and External Stakeholders incorporated in the Standard Operating Procedure for Stakeholders Engagement dated 9th April 2021 approved by Dato Carl Bek Nielsen, Chief Executive Director.</p> <p>The policy on Documents, has declared the Company's Publicly Available and Non-Publicly Available documents. Some sampled Publicly and Non-Publicly available documents for UPB as evidence bellows :</p> <ul style="list-style-type: none"> Publicly : land titles / user rights, HCV documentation, Pollution prevention and reduction plans, details of complaints & grievances, negotiation procedures, continual improvement plans, public summary of certification assessment report, human right policy, etc Non-publicly : all company's SOP and field management manuals & guidelines to various operations documents <p>Requests for publicly available documents are made through the respective mill manager/estate manager and he will make the decision as to whether the documents requested can be shared to or viewed by the person requesting the information or document.</p>	Yes
1.1.2	<p>UPB has also established Consultation and Communication Procedures for the Internal and External Stakeholders incorporated in the Standard Operating Procedure for Stakeholders Engagement dated 9th April 2021 approved by Dato Carl Bek Nielsen, Chief Executive Director.</p> <p>The above Procedure is communicated to the Internal and External Stakeholders in the following manner. The result of interview with the contractor for CSPO transportation, Kiara Jubli estate, School, SRJK (T) Ulu Bernam, Mosque representative, Temple Representative and some employees that they have understood consultation & communication procedure for internal stakeholder or stakeholder engagement procedure for external stakeholder.</p>	Yes



	Distribution of Employee and Stakeholder 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 and estate office.	
1.1.3 (C)	<p>UPB has also established a Request and Response Procedure for the request of documents by Internal and External Stakeholders incorporated in the Standard Operating Procedure for Stakeholders Engagement dated 9th April 2021 approved by Dato Carl Bek Nielsen, Chief Executive Director.</p> <p>The result of the document (stakeholders logbook) verification period of June 2023 to May 2024 is that there is no request for information from stakeholders so the record of their responses is not available too. Whereas, based on an interview with PIC of receiving and responding to requests in mill, estate and group there are no requests for information from the stakeholders and they have understood that the management shall respond to the request by one (1) week.</p> <p>Based on the stakeholder logbook was verified that there are request and response cases about maintaining facility from workers examples such as :</p> <ul style="list-style-type: none"> • Request change of lamp in emplastment no. J-20 dated 01 June 2024. It has been responded and solved dated 02 June 2024 • Request change of lamp in emplastment no. D-05 dated 14 May 2024. It has been responded and solved dated 16 May 2024 • Request change of lamp in emplastment no. H-08 dated 09 May 2024. It has been responded and solved dated 12 May 2024 • Request change of lamp in emplastment no. D-06 dated 14 May 2024. It has been responded and solved dated 15 May 2024 • Request change of lamp in emplastment no. H-27 dated 02 April 2024. It has been responded and solved dated 03 April 2024 • Request change of lamp in emplastment no. K-07 dated on 08 April 2024. It has been responded and solved dated 10 April 2024 • Request handling flow water is slow in emplastment no. G-23 dated 11 May 2024. It has been responded and solved dated 12 May 2024 • Request handling water storage tank is broken in emplastment no. F-09 dated 08 April 2024. It has been responded and solved dated 09 April 2024 • Request change of lamp in emplastment no. F-19 dated 28 March 2024. It has been responded and solved dated 29 March 2024 • Request change of lamp in emplastment no. K-07 dated 03 March 	Yes



	<p>2024. It has been responded and solved dated 04 March 2024</p> <ul style="list-style-type: none"> Request change of lamp in emplastment no. H-30 dated 28 February 2024. It has been responded and solved dated 29 February 2024 Request handling pipe of water is broken in emplastment no. F-07 dated 21 February 2024. It has been responded and solved dated 22 February 2024 Request handling bathroom door & pipe of water is broken and leaky roof in emplastment no. F-10 dated 20 February 2024. It has been responded and solved dated 22 February 2024 Request change of lamp in emplastment no. H-03 dated 07 January 2024. It has been responded and solved dated 08 January 2024 Request change of lamp, door of toilet is broken and flushing on toilet is broken in emplastment no. J-02 dated 04 January 2024. It has been responded and solved dated 05 January 2024 	
1.1.4 (C)	<p>UPB has also established Consultation and Communication Procedures for the Internal and External Stakeholders incorporated in the Standard Operating Procedure for Stakeholders Engagement dated 9th April 2021 approved by Dato Carl Bek Nielsen, Chief Executive Director. It has been communicated to relevant stakeholders.</p> <p>The relevant stakeholders are aware of the consultation and communication procedure and understand how to contact PIC for stakeholder's consultation in mill and estate. They can walk into the estate's office and complete the Stakeholders Logbook and submit to the officer in charge.</p> <p>During the mill visit the following workers were interviewed on their understanding/awareness of the established SOP and the workers fully understood the procedure.</p>	Yes
1.1.5	<p>Ulu Basir Palm Oil Mill and Estate has established its Stakeholders list year 2024 with information such as Stakeholder, Contact Name & Address and Telephone/Fax Number / Email.</p> <p>The stakeholder's list is divided into five (5) categories namely Government Bodies, Non-Governmental Organization (NGO), Service Providers/Contractors/Suppliers, Neighbouring community/plantation/smallholders, contractors and estate community/estate representatives.</p>	Yes
1.2.1	<p>UPB has established its Code of Conduct and Business Ethics Policy dated 2019 approved by Dato' Carl Bek-Nielsen, Chief Executive Director. The policy is written in eight languages namely English, Bahasa Melayu, Bahasa Indonesia, Bengali, Hindi, Tamil, Nepali and Telegu for the Employees understanding.</p>	Yes



	<p>The policy has included the following aspect :</p> <ul style="list-style-type: none"> • Fair conduct of bussiness • A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources • A proper disclosure of information in accordance with applicable regulations and accepted industry practices 	
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 : sustainability internal audits, registered office internal audit, KPMG audit, Ernst & Young audit, risk committee assessment and customer satisfaction survey. Based on the interview result with the HRSS Manager the implementation of the above policy is further disseminated to the stakeholders via stakeholder meeting and company policies training. A copy of the handbook which contains the policy and ethical business practices was also given to all estates and mill employees. Employee and transporter samples have confirmed by interview that they have understood about code of conduct and business ethics policy. They have explained that no corruption, bribery and nepotism in the bussiness relationship with the company and recruitment process.</p>	Yes
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 Basir Mill</p> <ul style="list-style-type: none"> • D.O.E annual license renewal no.004217 for 60 MT validity period 01/07/2023 – 30/06/2024 • Weighbridge calibrated – ATI-ATK 000970 (60MT) dated on 07/07/2024, ATI-ATK 000970 (50MT) dated on 07/07/2024 and ATI-ATP 077067 (50MT) dated on 7/07/2024 • Suruhanjaya Tenaga, ST(PIP)P/S/PKK/01007 valid until 28/4/2027 • Crane No 1 (PMA 22902) expiring on 19/05/2025 	Yes

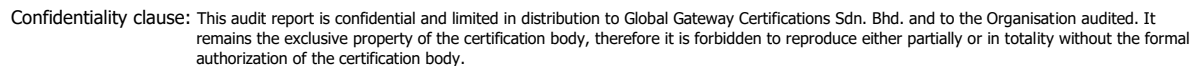


	<ul style="list-style-type: none"> • Crane No 2 (PMA 22904) expiring on 19/05/2025 • Crane No 3 (PMA 22905) expiring on 19/05/2025 • Crane No 4 (PMA 71153) expiring on 19/05/2025 • Crane No 5 (PMA 22903) expiring on 19/05/2025 • Sterilizer 1 (PMT 147625) expiring on 19/05/2025 • Sterilizer 2 (PK PMT 81327) expiring on 19/05/2025 • Sterilizer 3 (PMT 44794) expiring on 19/05/2025 • Sterilizer 4 (PK PMT 9685) expiring on 19/05/2025 • Sterilizer 5 (PK PMT 81663) expiring on 19/05/2025 • Sterilizer 6 (PK PMT 80519) expiring on 19/05/2025 • Workshop Compressor – PMT 50277 - expiring on 19/05/2025 • Sterilizer Compressor – PK PMT 81328 - expiring on 19/05/2025 • Oil Room Compressor – PMT 50279 - expiring on 19/05/2025 • New Boiler Compressor – PK PMT 80447 - expiring on 19/05/2025 • Spare Unit Compressor – PK PMT 7245 - expiring on 19/05/2025 • Spare Unit Compressor – PK PMT 7245 - expiring on 19/05/2025 • Biomass boiler (45mt/hr) – PK PMD 1079 expiring o 19/5/2025 • Biogas Enclosed Flare Compressor – PK PMT 80449 inspection expiring on 19/05/2025 • As per Schedule of Compliance land application is applicable from "Aerobic Pond #3" within allowable permit 5000 mg/l. • Lesen untuk mengendalikan atau menyediakan kemudahan atau perkhidmatan jagaan Kesihatan swasta, License No: 130807-00305-01/2024 Serial Number:007602 for 20 beds valid until 13/4/2026 • MPOB license no.: 500111304000, until 30/09/2024 (allowing 288,000MT/year for [buying FFB], selling [CPO, SPO, PK], storing [CPO, PK, SPO] and processing of FFB • Permit for Sodium Hydroxide (008004) as required by Poisons Ordinance 1952, Permit to purchase, store and use, 3200 liquid expires on 31 Dec 2024. 	
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	<ul style="list-style-type: none"> • CHRA – HQ/13/ASS/00/316-2021/030 conducted on 11/06/2022 that valid for 5 years. • Water Services Industry Act 2006, Water Service Industry (Licensing) Regulation 2007 valid until 25/05/2025. • Employees’ Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446), 6(a) Supply of water and electricity and maintenance of houses the permit valid until 10/02/2024. Application of new permit yet to approved. • Competent person for Schedule Waste Management – CePSWaM/02865 (Mohd. Shafiq Bin Naslah) • Competent person for Effluent Pond Management – The Senior Assistant Engineer CePPOME/00145 <p>Ulu Basir Estate</p> <ul style="list-style-type: none"> • MPOB license: 501894602000, validity – 30/09/2024, (3738 Ha) • Diesel storage permit no. A004187 for 8000 Litters – valid until 19/10/2025 • Water Abstraction License no. SPAN license as required by Water Services Industry Act 2006 – expiry 25th May 2025 (SPAN/EKS/PT/800-4(1)/15/09 and (SPAN/EKS/PT/800-4(2)/15/09 • Gun License for Estate Manager – Patrick a/l Kannan [Series No.MM/501] expiry on 8/4/2025 • Air Compressor Permit – PMT-PK/22 79083 valid until 26/9/2024 	
2.1.2	<p>The management continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring compliance with the legal requirements that are applicable to the UP’s operation.</p> <p>The mill has established Legal & Requirements Register (LRR) which was last reviewed on 13/3/2024 by Senior Assistant Engineer.</p> <p>As for Ulu Basir Estate, Legal & Requirements Register (LRR) was last updated on 10/05/2024 by Estate Assistant.</p> <p>A total of 69 local laws and 7 international laws are being documented.</p> <p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and being evaluated individually from</p>	Yes



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	1	3°43'58"	101°16'23"		
	10	3°41'41"	101°19'24"		
	20	3°43'36"	101°15'26"		
	25	3°43'21"	101°20'22"		
2.2.1	<p>List of contracted parties is maintained under stakeholder list dated 2/3/2023. From the list there are 3 contractors for CPO transporter listed under stakeholder list as per below:</p> <ol style="list-style-type: none"> 1. Sakthy Transport Sdn bhd 2. Sri Naresh Agency 3. Excellent Insight Sdn.Bhd. <p>Since July 2019, Ulu Basir POM becomes less production due to 80% of FFBs from Ulu Basir Estate being divided to Ulu Bernam Optimill.</p> <p>As for general works, the mill utilizes their workers to done the required works. The Mill and Estate have no temporary or short-term workers.</p>				Yes
2.2.2	<p>As per interview with UP HRSS team member who is partially in-charge for the agreement with contractors / 3rd party transport providers, there are 3 contractors as listed below;</p> <ol style="list-style-type: none"> i. Excellent insight Sdn. Bhd. ii. Sakthy Transport Sdn. Bhd. iii. Sri Naresh Agency <p>The agreement between United Plantations Berhad and Sakthy Transport Sdn Bhd, Sakthy Transport Sdn. Bhd and Sri Naresh Agency valid from 1/1/2024 until 31/12/2024.</p> <p>Besides the agreement, there is an attachment called Supplier Code of Conduct and Code of Conduct and Business Ethics that stating on compliance with laws and zero tolerance on corruption and bribery.</p> <p>No contractor being engaged in the Estate.</p>				Yes
2.2.3	<p>Contractors Contract Agreement was available for verification for all contracted parties with the mill. The contracts contain specific clause under 11 (a) disallowing child, forced and trafficked labour. Verified the sampled contract agreement as following:</p> <ul style="list-style-type: none"> • Excellent insight Sdn. Bhd. • Sakthy Transport Sdn. Bhd. 				Yes



	<ul style="list-style-type: none">Sri Naresh Agency No contractor being engaged in the Estate.																																									
2.3.1 (C)	The mill operates on 'IP Module' and source of FFB are from company owned RSPO Certified estates. Detail of supply base year 2023-2024 refer to section 1.4 above such as Ulu Basir Estate, Changkat Mentri Estate, Lima Blas Estate, Ulu Bernam estate and Charong Estate. All directly sourced FFB above has provided Information on geo-location of FFB origins, Proof of the ownership status or the right/claim to the land & valid planting/ operating/ trading license	Yes																																								
2.3.2	The mill operates on 'IP Module' and source of FFB are from company owned RSPO Certified estates so that indirectly sourced FFB not available. The mill was able to produce the details of estate locations, area statement that has planting years.	Yes																																								
Principle 3: Optimise productivity, efficiency, positive impacts and resilience																																										
Indicator	Summary of Findings	Compliance (Y/N) and NC#																																								
3.1.1 (C)	<p>Ulu Basir Palm Oil Mill has established its Business Plan for the three (3) years namely for the years 2025, 2026 and 2027. Given below are the details.</p> <table><tr><th>Year</th><th>2025</th><th>2026</th><th>2027</th></tr><tr><td>FFB (MT)</td><td>119,149</td><td>125,106</td><td>131,361</td></tr><tr><td>CPO (MT)</td><td>26,808</td><td>24,149</td><td>29,556</td></tr><tr><td>OER (%)</td><td>22.50%</td><td>22.50%</td><td>22.50%</td></tr><tr><td>KER (%)</td><td>4.75%</td><td>4.75%</td><td>4.75%</td></tr></table> <p>Ulu Basir Estate has established its Business Plan for the three (3) years namely for the years 2025, 2026 and 2027. Given below are the details.</p> <table><tr><th>Year</th><th>2025</th><th>2026</th><th>2027</th></tr><tr><td>FFB (MT)</td><td>110,473</td><td>113,524</td><td>113,560</td></tr><tr><td>Upkeep (RM/MT CPO)</td><td>568.00</td><td>612.00</td><td>685</td></tr><tr><td>Harvesting (RM/MT CPO)</td><td>301.00</td><td>319.00</td><td>351.00</td></tr><tr><td>OER (%)</td><td>22.50%</td><td>22.50%</td><td>22.50%</td></tr></table>	Year	2025	2026	2027	FFB (MT)	119,149	125,106	131,361	CPO (MT)	26,808	24,149	29,556	OER (%)	22.50%	22.50%	22.50%	KER (%)	4.75%	4.75%	4.75%	Year	2025	2026	2027	FFB (MT)	110,473	113,524	113,560	Upkeep (RM/MT CPO)	568.00	612.00	685	Harvesting (RM/MT CPO)	301.00	319.00	351.00	OER (%)	22.50%	22.50%	22.50%	Yes
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	There is an uptrend in the cost due to anticipation of material and labour cost increase.	
3.1.2	Ulu Basir estate has no replanting programme as the palms are 8-20 years old.	Yes
3.1.3	<p><u>ULU BASIR PALM OIL MILL</u></p> <p>Ulu Basir Palm Oil Mill has conducted its Management Review Meeting for the Year 2023 on 29th April 2024.</p> <p><u>Given below are the details of the said meeting.</u></p> <p>Date: 29th April 2024 Venue: Ulu Basir Office Chaired By: Mr. Muhammad Syafiq Bin Naslah Attendance: 9 participants.</p> <p>The meeting was attended by the Sr. Assistant Engineer, Mill Supervisor, Chief Clerk and Office Clerks. Sighted management review meeting minutes for mill for the year 2024 that consists of agenda as below:</p> <ul style="list-style-type: none"> • Applicable laws and regulations • Business plan (Annual Budget) • Environmental Impacts Assessment • Energy usage <ul style="list-style-type: none"> -Diesel -Renewable Energy • Schedule waste management, • Social Impact Assessment (SIA) • Stakeholders Communication and Consultations/Consultations/Complaints and Grievance • Internal/External Audit Findings • Customer feedback • Proses performance and Product conformity • Status of corrections and corrective actions • Follow up actions from previous management review. • Changes that could affect the management system. • Recommendations for improvement. <p><u>ULU BASIR ESTATE</u></p> <p>Ulu Basir Estate has conducted its Management Review Meeting for the Year 2023 on 28th May 2024.</p> <p><u>Given below are the details of the said meeting.</u></p>	Yes



	<p>Date: 28th May 2024 Venue: Ladang Ulu Basir Conference Room Chaired By: Mr. Patrick Kanan, Senior Manager Attendance: 10 participants.</p> <p>The meeting was attended by the Sr. Asst Manager, Office Clerk, Chief Clerk, Supervisor and Field Staff. Sighted management review meeting minutes for mill for the year 2024 and the following agenda were discussed.</p> <ul style="list-style-type: none"> • Applicable laws and regulations • Business plan (Annual Budget) • Environmental Impacts Assessment • Energy usage <ul style="list-style-type: none"> -Diesel -Renewable Energy • Schedule waste management, • Social Impact Assessment (SIA) • Stakeholders Communication and Consultations/Consultations/Complaints and Grievance • Internal/External Audit Findings • Customer feedback • Proses performance and Product conformity • Status of corrections and corrective actions • Follow up actions from previous management review. • Changes that could affect the management system. • Recommendations for improvement. 							
3.2.1 (C)	<p><u>ULU BASIR PALM OIL MILL</u></p> <p>Mill has established its Continuous Improvement Plan (CIP) programme based on the consideration of the daily operations, social and environmental impact factors. The CIP is documented and maintained in the Estate's office.</p> <p><u>Given below are some sampled CIP as evidence.</u></p> <table border="1"> <thead> <tr> <th>Continuous Improvement Plan</th><th>Action Plan/Target</th><th>Person Incharge</th></tr> </thead> <tbody> <tr> <td>Domestic Water Usage</td><td> Good maintenance on water piping <u>Target</u> </td><td>En Syafiq bin Naslah, Sr Asst Engineer</td></tr> </tbody> </table>	Continuous Improvement Plan	Action Plan/Target	Person Incharge	Domestic Water Usage	Good maintenance on water piping <u>Target</u>	En Syafiq bin Naslah, Sr Asst Engineer	Yes
Continuous Improvement Plan	Action Plan/Target	Person Incharge						
Domestic Water Usage	Good maintenance on water piping <u>Target</u>	En Syafiq bin Naslah, Sr Asst Engineer						



		2024	
	POME Usage By estate	POME production in tandem with FFB processed <u>Target</u> 2025	En Syafiq bin Naslah, Sr Asst Engineer
	Number of Spent Batteries dispatched to waste	Reduce/ limit no of vehicles usage and proper maintenance procedure to increase lifespan of the baterries. <u>Target</u> 2025	En Syafiq bin Naslah, Sr Asst Engineer

ULU BASIR ESTATE

Estate has established its Continuous Improvement Plan (CIP) programme based on the consideration of the daily operations, social and environmental impact factors. The CIP is documented and maintained in the Estate’s office.

Given below are some sampled CIP as evidence.

Continuous Improvement Plan	Action Plan/Target	Person Incharge
Reduce domestic water usage to 50 gallons per capita	More Reach and Teach, Reach and Remind Training to increase self-awareness among worker To continue to educate worker on water saving. <u>Target</u> 2025	Mr Prabhakaran, Asst Manager

	Increase Beneficial Plant in Integrated Pest Management	-Establishing new IPM Plants and educating workers on benefits of IPM plants <u>Target</u> 2025	Mr Prabhakaran, Asst Manager	
	Increase Barn Owl boxes from 247 to 280 boxes	To continue monitoring and census, preventive maintenance for Barn Owl Boxes. <u>Target</u> 2025	Mr Prabhakaran, Asst Manager	
3.2.2	As per an Interview with Mr Lee Kian Wei, HRSS/Sustainability Manager, United Plantations Berhad submitted its annual report (ACOP 2023) in 23 th 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)	<u>ULU BASIR PALM OIL MILL</u> Ulu Basir Palm Oil Mill has established and documented its Standard Operating Procedures for its operations dated January 2008 approved by Dato Carl Bek Nielsen. No new machinery and process, as such the SOP remains. Given below are some sampled SOP as evidence. <ol style="list-style-type: none"> 1. Reception and Fruit Handling 2. Sterilization 3. Threshing 4. Digestion Pressing 5. Boiler House 6. Kernel Extraction 7. Raw Water Plant 8. Laboratory The SOPs are available at the Engineering Department Office and is readily accessible by the employees for reference. Training for SOPs in the mill was conducted for the employees understanding <u>Given below are some sample trainings conducted as evidence.</u>			Yes



Trainings	Date	Trainer
SOP on Clarification Plant	22/1/2024	En Syafiq bin Naslah, Sr Asst Engineer
SOP on Overhead Crane	16/5/2024	En Syafiq bin Naslah, Sr Asst Engineer
SOP on Screw Press	16/4/2024	Mr R. Nathan. Resident Engineer

ULU BASIR ESTATE

Ulu Basir Estate has established and documented its Standard Operating Procedures for its operations. Given below are some sampled Standard Operating Procedures as evidence.

1. Nursery Operations
2. Replanting
3. Upkeep mature/immature Oil Palm
4. Water management
5. Roads
6. Paths
7. Railway Locomotive
8. Boundaries
9. Oil Palm Pest Management
10. Manuring immature and mature Oil Palm
11. Harvesting and Collection
12. Oil Mill RSPO Supply Chain Module
13. Latest SOP on Recruitment of Executive, non-Executive (Staff), Local Workers, and Guest Workers.
14. Protection of River Reserves (Riparian & Buffer Zone)
15. Internal Audit
16. Safe Deposit Lockers for Guest Workers' passports
17. Traceability

The Standard operating Procedures were prepared by the United Plantations Research department dated 2007 and approved by Dato Carl Bek-Nielsen, Chief Executive Director. The SOPs are available at the Estate's Office and is readily accessible by the employees for reference.

Training on Standard Operating Procedures for its operations was conducted for the employees by the estates to enhance their



	<p>knowledge. Given below are some sample trainings conducted as evidence.</p> <table border="1"> <tr> <th rowspan="2">Description</th><th colspan="2">Training</th></tr> <tr> <th>Waste Management & chemical Spillage</th><th>Fire Drill</th></tr> <tr> <td>Date</td><td>04/02/2024</td><td>29/5/2024</td></tr> <tr> <td>Time</td><td>7.30 am</td><td>4.50 pm</td></tr> <tr> <td>Location</td><td>Tractor Parking</td><td>LUB Complex</td></tr> <tr> <td>Trainer</td><td>Suhaizam bin Islah</td><td>C. Prabhakaran</td></tr> <tr> <td>Attendance</td><td>6 participants</td><td>27 participants</td></tr> </table>	Description	Training		Waste Management & chemical Spillage	Fire Drill	Date	04/02/2024	29/5/2024	Time	7.30 am	4.50 pm	Location	Tractor Parking	LUB Complex	Trainer	Suhaizam bin Islah	C. Prabhakaran	Attendance	6 participants	27 participants	
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3.3.2	<p><u>ULU BASIR PALM OIL MILL</u></p> <p>Checking on the implementation of SOP's will be carried out through a yearly Internal Audit which will be conducted by the HRSS department. The latest Internal Audit was conducted on 14th March 2024. Further, routine daily supervising by the Engineers and supervisors is also part of mechanism to check consistent implementation of applicable procedures and SOPs in the Mill. The mill also regularly conducts training for all workers in the mill operations to ensure workers are fully aware and understand the SOP.</p> <p><u>Given below are some sample trainings of SOP carried out by the Mill as evidence.</u></p> <table border="1"> <tr> <th>Trainings</th><th>Date</th><th>Trainer</th></tr> <tr> <td>SOP on Chemical Spillage/Laboratory</td><td>1/3/2023</td><td>En Syafiq bin Naslah, Sr Asst Engineer</td></tr> <tr> <td>SOP on Screw Press /Digester/Cake Breaker</td><td>1/4/2023</td><td>En Syafiq bin Naslah, Sr Asst Engineer</td></tr> <tr> <td>Sterilizer Station HIRARC and SOP</td><td>7/9/2023</td><td>Mr R. Nathan. Resident Engineer</td></tr> </table> <p><u>ULU BASIR ESTATE</u></p> <p>Checking on the implementation of SOP's will be carried out through a yearly Internal Audit which will be conducted by the HRSS department. The latest Internal Audit was conducted on 10th April 2024. Further, daily routine supervising by the Asst Managers, Supervisors and Field Staff is also part of the mechanism to check consistent implementation of applicable procedures and SOPs in the Estate. The Estate also regularly conducts training for all workers in</p>	Trainings	Date	Trainer	SOP on Chemical Spillage/Laboratory	1/3/2023	En Syafiq bin Naslah, Sr Asst Engineer	SOP on Screw Press /Digester/Cake Breaker	1/4/2023	En Syafiq bin Naslah, Sr Asst Engineer	Sterilizer Station HIRARC and SOP	7/9/2023	Mr R. Nathan. Resident Engineer	Yes								
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Description	Training												
	Tractor and Locomotive procedure and PPE usage	Manuring SOP [Manual]											
Date	04/04/2024	6/5/2024											
Trainer	Mr. Pratap Raj	Mr. D. Saravana Kumar											
3.3.3	<p>Sighted the internal annual audit conducted by the HRSS following RSPO principle and criteria to evaluate Findings, comments and corrective action were recorded in the audit report.</p> <p>Internal audit for Mill was conducted on 14th March 2024 and Estate was conducted on 10th April 2024. Result of both internal audit is no Non-Conformance raised during the Audit.</p>	Yes											
3.4.1 (C)	<p>As per Interview with Sr. Asst. Engineer and Ulu Basir Asst Manager during site visit, no extension of its operation or acquired new land for estate operations was found. As any of the operations indicated with low indications therefore it does not require any mitigation measures, for moderate/high a root cause identification and action plans required to manage the associated risks.</p> <p>Most of 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 into any diseases or illness.</p> <p>Sighted the mill has conducted the Social and Environmental Impact Assessment (SEIA) for Internal stakeholders on 19/03/2024 [8 respondents] and for External stakeholders was on 25/04/2024 [9 respondents]. The SEIA was conducted via a survey where a survey form was sent to the respondents to collect feedback.</p> <p>For Ulu Basir Estate, the management has conducted the Social and Environmental Impact Assessment (SEIA) for Internal stakeholders on 20/05/2024 [41 respondents]. The SEIA was conducted via a survey where a survey form was sent to the respondents to collect feedback.</p> <p>Among categories evaluated in the SEIA are as follows :</p> <ol style="list-style-type: none"> 1. Housing & Amenities, 	Yes											



	<div>2. Occupational Safety & Health,</div> <div>3. Environmental Pollution,</div> <div>4. Religious and Educational Amenities,</div> <div>5. Code of Conduct,</div> <div>6. Others.</div>																	
3.4.2	<p>Ulu Basir Palm Oil Mill conducted its "Social and "Environment Impact Assessment" on 19/03/2024 involving 8 randomly picked internal stakeholders while for external stakeholders involving 9 respondents carried out on 25/04/2024.</p> <p>The survey and study methodology were used by the estate to determine the Positive and negative impact on social aspects. Report has specified the type of respondents from gender, nationality, and workplace.</p> <p>Sampled positive and negative impact for Internal and External identified during the assessment as evidence.</p> <p>External Stakeholders</p> <table><tr><th>Issue arises</th><th>Comments</th><th>Action Plan</th><th>Status/PIC</th></tr><tr><td colspan="4">Positive Impact</td></tr><tr><td>Awareness on Management initiatives in Human Rights</td><td>All respondents are aware of the company's initiatives on Human Rights</td><td>Management will continue to ensure that it upholds all legal requirements that involve human rights such as:<ul style="list-style-type: none">The Company will only employ/engage workers aged 18 and above,The company has a widely understood grievance procedure in place to handle any complaints raised by stakeholders that is made publicly available on our company website.</td><td>On going. Estate Management Team</td></tr><tr><td>Awareness on company Sustainability Policies</td><td>All respondents are aware of the company's Sustainability Policies</td><td>Management will continue to communicate company sustainability policies by publishing them in the website</td><td>On going. Estate Management Team</td></tr></table>	Issue arises	Comments	Action Plan	Status/PIC	Positive Impact				Awareness on Management initiatives in Human Rights	All respondents are aware of the company's initiatives on Human Rights	Management will continue to ensure that it upholds all legal requirements that involve human rights such as: <ul style="list-style-type: none">The Company will only employ/engage workers aged 18 and above,The company has a widely understood grievance procedure in place to handle any complaints raised by stakeholders that is made publicly available on our company website.	On going. Estate Management Team	Awareness on company Sustainability Policies	All respondents are aware of the company's Sustainability Policies	Management will continue to communicate company sustainability policies by publishing them in the website	On going. Estate Management Team	Yes
Issue arises	Comments	Action Plan	Status/PIC															
Positive Impact																		
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Awareness on company Sustainability Policies	All respondents are aware of the company's Sustainability Policies	Management will continue to communicate company sustainability policies by publishing them in the website	On going. Estate Management Team															



		and updating them when applicable		
Internal Stakeholders				
Issue	Comments	Action Plan	Status/PIC	
Positive Impact				
Utilities provided	All respondents are satisfied with the utilities provided	Management will continue to provide good quality utilities to the employees	On going. Estate Management Team	
Work Safety	All respondents are satisfied with the safety of their work area.	Management will continue to ensure a safe working environment for employees.	On going. Estate Management Team	
<p>Ulu Basir Estate conducted its SEIA on 20/05/2024 involving 41 internal stakeholders. Given below are some sampled positive and negative impact for Internal Stakeholder identified during the assessment as evidence.</p>				
Internal Stakeholders				
Issue	Comments	Action Plan	Status/PIC	
Positive Impact				
Pollution caused by Estate Operations	All respondents do not think that operations cause any significant form of pollution.	Management will continue to ensure operations do not cause any significant pollution.	On going. Estate Management Team	
Awareness on Management Climate Change Initiatives	All respondents are aware of the Management 's Climate change initiatives such as no open burning that helps reduce GHG emissions.	Management will continue to train and remind workers on the Company's Climate Change Initiatives.	On going. Estate Management Team	
<p>As per interviewed with Assistant Manager, external stakeholder meeting for Ulu Basir Estate was conducted centralized with Ulu Basir Mill.</p>				
3.4.3 (C)	Sighted the Social Impact Assessment and Environmental Impact Assessment for Ulu Basir Mill and Ulu Basir Estate. The assessment will only be reviewed and updated when there are any negative issues raised by the Stakeholders. No negative issues were raised as per this assessment, as such no review was carried out.			Yes



3.5.1	<p>United Plantations Berhad has established its Procedures for recruitment for the recruitment of Local and Guest Workers. Given below are the procedures as evidence.</p> <ol style="list-style-type: none"> 1. Recruitment of Local Workers. Revision 01, date: 31/03/2020. 2. Recruitment of Guest Workers. Revision 03, date: 31/03/2020. <p>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;</p> <ol style="list-style-type: none"> 1. Malaysian applicable laws and regulations [e.g. OSH Act, Employment Act etc.] and 2. United Plantations Berhad's company Policies and SOP, MSPO and RSPO's requirements including Human Rights Policy, OSH Policy and Code of Conduct and Business Ethics. <p>For recruitment of specific competency workers for mill and estates, it to advertise in company website or in local newspaper [Ref. Doc. SOP Recruitment of Executives and Non-executives Staff, Appendix 1]. As per sighted in mill employee details, no promotion of workers occurred in year 2023. The latest workers promotion to Mill Staff occurred in the year 2021.</p> <p>Sighted the "Post-Arrival Orientation Programme" for foreign workers. Amongst the information briefed were MAPA/NUPW Collective Agreements, Union, Company Policies. The form will be signed by the worker and trainer. In addition, the above forms and policies will be translated into their native language.</p>	Yes
3.5.2	<p>United Plantations Berhad has established its Recruitment Procedures dated March 2020 approved Dato Carl Bek Nielsen, Chief Executive Director. The said employment contract is explained and translated into the employees native language for their understanding.</p> <p>All new guest workers (foreign workers) must be provided with :</p> <ol style="list-style-type: none"> 1. Kit allowance of RM 150.00, 2. Employees handbook in their respective native language and explained during the induction programme, 3. Accommodation with clean interior, adequate supply of water, and electricity. 4. Meals for the first two days from their arrivals. 	Yes



	<div>5. Facilities & Workplace,</div> <div>6. Amenities;<div><div>i. Per worker:1 pc single mattress foam, 1 pc pillow, 1 pc blanket, 1 pc plate, 1 pc mug and 1 set fork / spoon.</div><div>ii. Per household: 1 unit twin head gas stove, 1 set plastic pail and scoop, 1 unit rice cooking pot, 1 unit keettle, 1 unit curry cooking pot, and 1 unit frying pan.</div></div></div> <div><div>ULU BASIR PALM OIL MILL</div><div>Sighted foreign workers [Indian and Bangladesh] employment contract written in dual language i.e., Tamil and English [Indian worker] and Bengali and English [Bangladesh worker] with details of contract duration, wages, working hours, piece rate, rest day, accommodation. For local worker the employment contract is written in Bahasa Malaysia.</div><div>Given below is the sampled employees employment contract as evidence.</div><div><table><tr><th>Employee ID</th><th>Nationality</th><th>Date Join</th></tr><tr><td>10xxx</td><td>Malaysian</td><td>15/01/2024</td></tr><tr><td>10xxx</td><td>Malaysian</td><td>15/01/2024</td></tr><tr><td>10xxx</td><td>Malaysian</td><td>12/09/2023</td></tr><tr><td>10xxx</td><td>Malaysian</td><td>10/07/2023</td></tr><tr><td>10xxx</td><td>Malaysian</td><td>12/04/2023</td></tr></table></div><div>Given below is the sampled employees employment contract as evidence.</div><div><table><tr><th>Total Workers</th><th>Nationality</th><th>Sampled ID</th><th>Date Join</th></tr><tr><td>22</td><td>Bangladeshi</td><td>188xxx, 188xxx, 188xxx, 188xxx, 188xxx</td><td>As at 27/5/2024</td></tr><tr><td>28</td><td>Bangladeshi</td><td>188xxx, 188xxx, 188xxx, 188xxx, 188xxx, 188xxx</td><td>As at Dec 2023</td></tr></table></div></div>	Employee ID	Nationality	Date Join	10xxx	Malaysian	15/01/2024	10xxx	Malaysian	15/01/2024	10xxx	Malaysian	12/09/2023	10xxx	Malaysian	10/07/2023	10xxx	Malaysian	12/04/2023	Total Workers	Nationality	Sampled ID	Date Join	22	Bangladeshi	188xxx, 188xxx, 188xxx, 188xxx, 188xxx	As at 27/5/2024	28	Bangladeshi	188xxx, 188xxx, 188xxx, 188xxx, 188xxx, 188xxx	As at Dec 2023	
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3.6.1 (C)	United Plantations Berhad has established its Occupational Safety and Health Policy dated 8/03/2021 approved by Dato Carl Bek Nielson, Chief Executive Director, and revised Occupational Safety &	Yes																														



	<p>Health (OSH) Policy on 25/3/2021 signed by Mr. C. Mathews, Group Manager Human Resources, Sustainability and Safety (HRSS).</p> <p>Ulu Basir Oil Mill has established its HIRARC based on its operations dated 01/04/2022 which included all the relevant activities in the Mill operations. A total of 39 HIRARC documents were available during the time of audit. Given below are some sampled HIRARC assessed as evidence :</p> <ol style="list-style-type: none"> 1. Workshop. 2. Laboratory. 3. Weighbridge. 4. Locomotive Cage Derailment. 5. Overhead Crane Station. 6. Steam Turbine. 7. Biogas Plant. <p>Ulu Basir Estate has established its HIRARC based on its operations which includes all the relevant activities in the Estate operations. A total of 39 HIRARC documents were available during the time of audit. All the documents were last reviewed on 01/01/2024. Given below are some sampled HIRARC assessed as evidence:</p> <ol style="list-style-type: none"> 1. Harvesting FFB. 2. Spraying weedicide. 3. Trunk Injection. 4. Turbomiser Spraying. 5. Manuring – Mechanical. 6. Working at Height. <p>Sustainability & OSH Training Program 2024 or both managements were made available.</p> <p>ERP has been established for floods, fire, chemical spillage, and wild attack. Includes was Emergency evacuation Plan for the whole management complex.</p> <p>First Aider for the mill has been certified for Occupational First Aid & CPR AED Level 1 until 9/6/2026. With 4 personnel has been involved. For Ulu Basir Estate, 10 employees have attended the similar course. Sighted the certificates and verified through interview with Mr. Saravana Kumar A/L Doraisamy, HA.</p>	
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	<p>Sighted fire extinguisher list for Ulu Basir Mill for year 2024. There are 40 pcs available located at strategic area and valid until 3/7/2024. While for Ulu Basir Estate, the list indicates there are 26 units are available and still valid until 26/9/2024.</p> <p>PPE has been provided to all employees. From the record, sampled worker (ID no.: 10xxx, Cage handler) provided with ear plug on 14/1/2024. (ID No.: 10xxx - Fireman) was provided with safety helmet on 6/6/2024.</p> <p>For Ulu Basir Estate, PPE issuance record was made available. Sampled worker (ID no.: Mxxx, CKS Sprayer) provided with apron, respirator, and Nitrile glove on 13/5/2024. (ID No.: Sxxx – CDA Sprayer) was provided with Rubber boots, Nitrile glove, Apron and google on 21/5/2024.</p> <p>ESH Committee chart was made available, or Ulu Basir Mill, chaired by Sr, Asst. Engineer, and assisted by both management representatives and employee representatives consist of local and foreign employees. While for Ulu Basir Estate, the committee is led by Operations Controller, Mr. Prabhakaran, and assist by On Scene Controller, Mr. Pratap Raj.</p> <p>Latest OSH Committee Meeting for Ulu Basir Mill was conducted on 14/03/2024 at Mill office attended by all the committee members. Moreover, for Ulu Basir Estate, latest OSH Committee Meeting for Ulu Basir Mill was conducted on 06/03/2024 at Ulu Basir estate office attended by 22 committee members. Agenda discussed during the meeting are: OSHA Policy review, HIRARC review, CHRA Review, Annual Medical Surveillance, Safety Performance, PPE, OSH Training and ERP.</p> <p>Workplace inspection was last conducted on 11/03/2024 sighted at kernel Plant, while weighbridge station on 24/12/2023. While for Ulu Basir Estate, workplace inspection has been discussed during last OSH Committee Meeting, all the risk has been identified and briefed to the members. From the record, latest workplace inspection was done for Ulu Basir Estate on 29/4/2024. No chemical found spilled, and wasted.</p>	
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	<p>ERT training has been conducted on 10/06/2024 involving 5 workers. Training on First Aid and CPR was conducted on 9/06/2024 for 22 Mill employees and 10 Estate employees and briefed by Mr. Karunamoorti Ganti, Senior Trainer from Power Solution Training Management PLT.</p> <p>Ulu Basir Mill JKPP 8 for 2023 (submitted on 25/01/2024) Ref. Doc.: JKPP 8/172824/2023 was verified that there were 3 major accidents happened. Stated the rate of fatality at 0%, rate of incidents 43.69% with frequency of 20.37 and severity at 1,113.40. While for Ulu Basir Estate, JKPP 8 for 2023 (submitted on 13/01/2024) Ref. Doc.: JKPP 8/163221/2023 was verified that there were 10 major accidents happened. Stated the rate of fatality at 0%, rate of incidents 30.11 % with frequency of 13.45 and severity at 383.26.</p>	
3.6.2 (C)	<p>Sighted the OSH Planner for 2024 which includes among others workplace audit/Inspection, Safety performance, Medical Surveillance, Fire Drill/Training, Noise Risk Assessment, Audiometric Testing for employees exposed to noise, PPE Training, First Aid Training, Hearing Conservation Training etc.</p> <p>Ulu Basir Palm Oil Mill has also established its Emergency Response Plan for Chemical Spillage, Fire, Flood, Chemical Spillage (store/Premix) Chemical Accidents, and Physical Injury, dated December 2021 with clear instructions which are clearly understood by all employees. The emergency Response Plan flowchart was made available during Audit. The Emergency Response Team for 2024 is headed by Mr. Muhammad Syafiq and assisted by Mr. Sathyanada.</p> <p>As per interviews with workers during the site visit, found that workers are aware on the safety aspects during work. They informed us that the management has organized training on Safety and Health and communicated information on Safety and Health issues during Morning Muster.</p> <p>United Plantations Berhad has established its Occupational Health and Safety Policy dated 08/03/2021 approved by Dato' Carl Bek Nielsen, Chief Executive Director.</p> <p>The policy outlines the commitment of the company to the following:</p> <ol style="list-style-type: none"> 1. Devote our continuous effort to accident prevention by conducting Hazard Identification, Risk Assessment and Risk Control (HIRARC) on all our operations. 	Yes



	<ol style="list-style-type: none"> 2. Provide continuous training and supervision to all categories of employees through our "Reach and Teach, Reach and Remind" approach to strengthen safety awareness. 3. Equip and train employees to use appropriate protective equipment and to develop a health and safety-conscious citizen. 4. Total phase-out of Paraquat weedicide since 2010. 5. Ensure fire safety plan is implemented and continuously trained for its preparedness within our organization and neighboring communities. 6. Strive to commit our employees, contractors, suppliers, trading partners and stakeholders to adhere to this policy as well as safety and health regulations and standards. <p>The Mill has appointed Mr. Muhamad Syafiq bin Naslah, Sr. Asst. Engineer, as the person responsible for employees Safety for implementing and monitoring the H&S Plan vide letter dated 31/01/2022 approved by Mr. Nathan, Resident Engineer.</p> <p>While for Ulu Basir Estate, has appointed Mr. Patrick Kanan, Sr. Estate Manager, as the person responsible for employees Safety for implementing and monitoring the H&S Plan vide letter dated 1/07/2023 approved by Dato' Carl Bek-Nielsen, Chief Executive Director.</p> <p>Ulu Basir POM has conducted CHRA for its employees handling Chemical [Ref. Doc.: HQ/13/ASS/00/316-2021/030] by Ms. Hemalatha Tamil Selvan DOSH Registration Number HQ/13/ASS/00/316 dated 07/06/2022.</p> <p>For Ulu Basir Estate, CHRA has been conducted for its employees handling Chemical [Ref. Doc.: HQ/13/ASS/00/316-2021/032] by Ms. Hemalatha Tamil Selvan DOSH Registration Number HQ/13/ASS/00/316 dated 07/06/2022.</p> <p>As per the CHRA under clause 6.2.18, Medical Surveillance are not recommended to be continue for all the work unit since the worker is not exposed to chemicals listed in Schedule II of USECHH regulations, and the result for fitters are below the level (3 µg/g creatinine).</p> <p>However, the Mill still conducting the medical surveillance for 2 work units: lab assistants and fitters. While Estate still conducting the medical surveillance, on 13/4/2024 and the details as below:</p>	
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		Work Unit	No. Of workers
		CKS Sprayer	11
		Trunk Injection	5
		Store Attendant	1
		Workshop	4
		Carpenter	2
		Maxiboom (Spray)	3
	<p>All the Medical Surveillance was conducted by Dr. Lee Teik Leong, Family & Occupational Health Doctor. All workers are concluded to be fit for work.</p> <p>Sighted Noise Risk Assessment was last conducted for Ulu Basir Engineering Department on 13/02/2020 [Ref. Doc.: EE/0220/1192] by Mr. Nagendran A/L Periaiah, Noise Risk Assessor. Identified 3 working area exceeded the permitted maximum noise level of 115 dB (A): Kernel Plant, Marshalling Yard and Digester Screw Press Area.</p> <p>In Ulu Basir Estate, Noise Risk Assessment was last conducted on 11/08/2020 [Ref. Doc.: LUB2020-1.9] by Mr. Harrison Perabu Gunasakaran, Noise Risk Assessor. Identified 4 working area exceeded the permitted maximum noise level of 115 dB (A): Fitter, Mechanized Frond cutting, Mechanized FFB cutting, and Crawler Driver.</p> <p>For Ulu Basir Mill, Audiometric Test Report was conducted on 22/11/2023 by Ansonex Resources Group. Out of 48 employees tested, no employees were found to have abnormal audiometry results. While for Ulu Basir Estate, Audiometric Test Report was conducted on 10/05/2024 by Ansonex Resources Group. Out of 29 employees tested, also, no employees were found to have abnormal audiometry results.</p>		
3.7.1 (C)	<p>Ulu Basir Palm Oil Mill has established its Annual Training Programme dated 31/12/2023 for its employees prepared by Mr. Muhamad Syafiq bin Naslah, Sr. Asst Engineer approved by Mr. Nathan, Resident Engineer.</p> <p>For Ulu Basir Estate, the management has established its Annual Training Programme dated 31/12/2023 for its employees prepared by Mr. Muhamad Syafiq bin Naslah, Sr. Asst Engineer approved by Mr. Nathan, Resident Engineer.</p>	Yes	



	<p>The training programme is based on major tasks performed by an employee and their position and covers aspects of RSPO P&C, Safety Aspects and Best Management Practices. Given below are some sampled training programme by the Mill based on the Training Needs Analysis.</p> <table><tr><th>Training</th><th>Planned Date</th></tr><tr><td>Training on Company Policies, RSPO/MSPO</td><td>February</td></tr><tr><td>SOP & HIRARC for Crude Oil Tanks</td><td>January</td></tr><tr><td>SOP on Overhead Crane</td><td>February</td></tr><tr><td>SOP on Chemical Spillage</td><td>March</td></tr><tr><td>SOP on Digester</td><td>April</td></tr><tr><td>Fire Drill</td><td>June</td></tr><tr><td>ERT Training</td><td>June</td></tr></table> <p>Given below are some sampled training programme by the estate based on the Training Needs Analysis.</p> <table><tr><th>Planned Training</th><th>Planned Date</th></tr><tr><td>Safe Spraying Technique</td><td>January</td></tr><tr><td>Tractor & Locomotive Training</td><td>January</td></tr><tr><td>ERT Refresher training</td><td>March & September</td></tr><tr><td>Waste Management Training</td><td>February</td></tr><tr><td>Emergency Flood Response</td><td>November</td></tr><tr><td>First Aid Training</td><td>April</td></tr><tr><td>PPE Training</td><td>October</td></tr><tr><td>Fire Drills Training</td><td>June & October</td></tr></table>	Training	Planned Date	Training on Company Policies, RSPO/MSPO	February	SOP & HIRARC for Crude Oil Tanks	January	SOP on Overhead Crane	February	SOP on Chemical Spillage	March	SOP on Digester	April	Fire Drill	June	ERT Training	June	Planned Training	Planned Date	Safe Spraying Technique	January	Tractor & Locomotive Training	January	ERT Refresher training	March & September	Waste Management Training	February	Emergency Flood Response	November	First Aid Training	April	PPE Training	October	Fire Drills Training	June & October	
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3.7.2	<p>Ulu Basir Palm Oil Mill has 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 the Mill has developed an Annual Training Programme to implement the planned training. Sighted the training records and the participants list attending these formal training maintained by the Mill.</p> <p>Given below are some sample records of training conducted as evidence.</p>	Yes																																		

	<table><tr><th>Training</th><th>Date Conducted</th></tr><tr><td>Training on Company Policies, RSPO/MSPO</td><td>16/5/2024</td></tr><tr><td>SOP & HIRARC for Crude Oil Tanks</td><td>22/1/2024</td></tr><tr><td>SOP on Overhead Crane</td><td>16/5/2024</td></tr><tr><td>SOP on Chemical Spillage</td><td>15/5/2024</td></tr><tr><td>SOP on Digester</td><td>16/4/2024</td></tr><tr><td>Fire Drill</td><td>10/6/2024</td></tr><tr><td>ERT Training</td><td>10/6/2024</td></tr></table>	Training	Date Conducted	Training on Company Policies, RSPO/MSPO	16/5/2024	SOP & HIRARC for Crude Oil Tanks	22/1/2024	SOP on Overhead Crane	16/5/2024	SOP on Chemical Spillage	15/5/2024	SOP on Digester	16/4/2024	Fire Drill	10/6/2024	ERT Training	10/6/2024		
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<table><tr><th>Planned Training</th><th>Date conducted</th></tr><tr><td>Safe Spraying Technique</td><td>03/01/2024</td></tr><tr><td>Tractor & Locomotive Training</td><td>02/01/2024</td></tr><tr><td>Fitter training</td><td>04/04/2024</td></tr><tr><td>Waste Management Training</td><td>04/02/2024</td></tr><tr><td>Emergency Flood Response</td><td>11/01/2024</td></tr><tr><td>First Aid Training</td><td>06/05/2024</td></tr><tr><td>PPE Training</td><td>02/01/2024</td></tr><tr><td>Fire Drills Training</td><td>29/05/2024</td></tr></table>	Planned Training	Date conducted	Safe Spraying Technique	03/01/2024	Tractor & Locomotive Training	02/01/2024	Fitter training	04/04/2024	Waste Management Training	04/02/2024	Emergency Flood Response	11/01/2024	First Aid Training	06/05/2024	PPE Training	02/01/2024	Fire Drills Training	29/05/2024	
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3.7.3	<p>Ulu Basir POM have Officer In-Charge of RSPO SCC where have overall responsibilities and authority over the implementation of RSPO SCC requirements and compliance with all applicable requirements. Letter of appointment for PiC was available.</p> <p>In year 2023 that the RSPO SCC Training was conducted for mill and supply bases on 08/06/2023 attended by 11 staff and workers who have direct involvement in the supply chain process.</p> <p>Refreshment of RSPO SCC Training was conducted dated on 9th May 2024 which was attended by 5 workers who have direct involvement in the supply chain process. Training record was available i.e attendant list, photograph and training evaluation.</p> <p>The result of interview againts PiC and weighbridge officer that they has understood about task and role of RSPO SC implementation.</p>	Yes																	
Supply Chain Requirements for Mills																			
Identity Preserved Module																			



3.8.1	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. Based on the Weighbridge master list and production figure Period of June 2023 to May 2024 that the mill is receiving FFB from Ulu Basir Estate, Ulu Bernam Estate, Changkat Mentri Estate, Lima Blas Estate and Charong Estate (Sg. Erong & Sg. Chawang).	Yes
Mass Balance Module		
3.8.2	The mill is certified with IP supply chain model and only receiving FFB from UPB internal estates on June 2023 to May 2024. Ulu Basir POM has not received uncertified FFB so that MB supply chain model not implemented in mill.	N.A
3.8.3	The estimated tonnage of CPO and PK for period of June 2024 – May 2025 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	UPB is the RSPO Member # 1-0004-04-000-00. Ulu Basir POM has registered in Palmtrace System (member ID : RSPO_PO1000000240). 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. 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.	Yes
Documented Procedures		
3.8.5	<p>Sighted the "SOP of Supply Chain (in CPO Mill with Identity Preserved (IP) supply chain model)" with revision No.10 dated on 01/10/2022 applicable for receiving & processing of FFB, the traceability, definition of RSPO SCC Modules, etc. Sampled records are updated including the IP Book Keeping updated until May 2024.</p> <p>During visit to weighbridge station, interview the Weighbridge Operator (2 workers) has responded well to auditors' question on RSPO SCC requirements for incoming FFB certified, some estates has RSPO certified, the mechanism of CSPKO & CSPK dispatch (including their documentation), etc. Ulu Basir POM have Officer In-Charge of RSPO SCC where have overall responsibilities and authority over the implementation of RSPO SCC requirements and compliance with all applicable requirements. Letter of</p>	Yes



	<p>appointment for PiC was available. The result of interview againsts PiC and weighbridge officer that they has understood about task and role of RSPO SC implementation.</p> <p>Refreshment of RSPO SCC Training was conducted dated on 9th May 2024 which was attended by 5 workers who have direct involvement in the supply chain process. Training record was available i.e attendant list, photograph and training evaluation.</p>	
3.8.6	<p>Internal audit procedure seen with Rev. 01 dated 15/02/2019 and it will be conducting internal audit by annually. Sighted the recent internal audit summary report date on 22/03/2024.</p> <p>The audit was conducted by the HRSS team and audit result is no findings against RSPO SCC standard and the RSPO market communications and claims document. Seen the RSPO SCC Compliance Checklist has 14 indicators to verify the compliance.</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. The mill has verified and documented the tonnage and sources of certified. The record of tonnage of certified FFB on estate-division progeny summary report (FFB product). FFB from certified estates has stamped "certified sustainable FFB" on delivery chit by estate and on weighing slip – sales by mill. Weighbridge operator was understood that verifying and documenting the tonnage and sources of certified as one of him responsibilities.</p> <p>The mill's weighbridge system (Weight Watcher) 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. As per IP Book Keeping, the mill has no over production for the period of June 2023 - May 2024. If there is projected overproduction of certified tonnage that POM shall inform the CB immediately. It has stated on SOP supply chain (revision No.10 dated on 01/10/2022).</p> <p>Procedure for handling non-conformance products and/or documents has been highlighted in document of "SOP Supply Chain Procedure" revision #10 date on 01/10/2022. Based on the sample of documents below that not found non-conformance product and/or document :</p> <ul style="list-style-type: none"> • Product Delivery Order No. 13981 to 13986 • Weighing slip – sales No. D0002197 to 2202 • Sales report dated on 13 March 2024 	Yes



	<ul style="list-style-type: none"> • Delivery instruction from Registered office to POM dated on 12 March 2024 • Estate-division progeny summary report (FFB product) dated on 12 March 2024 	
Sales and Goods Out		
3.8.8	<p>The sample of document regarding CSPO & CSPK dispatch from Ulu Basir POM to buyer as belows :</p> <ul style="list-style-type: none"> • CSPO dispatch : Weighing slip – sales No. D0002197 to 2202 dated on 13 March 2024 and Delivery Order No. 13981 to 13986 dated on 13 March 2024 • CSPK dispatch : <ul style="list-style-type: none"> ○ Weighing slip – sales No. D0001751 dated on 26 June 2023 and Delivery Order No. 13557 dated on 26 June 2023 ○ Weighing slip – sales No. D0001750 dated on 23 June 2023 ○ Weighing slip – sales No. D0001743 dated on 19 June 2023 ○ Weighing slip – sales No. D0001735 dated on 16 June 2023 ○ Weighing slip – sales No. D0001726 dated on 14 June 2023 and Delivery Order No. 13553 dated on 14 June 2023 ○ Weighing slip – sales No. D0002055 dated on 28 Nov 2023 and Delivery Order No. 13816 dated on 28 Nov 2023 ○ Weighing slip – sales No. D0002047 dated on 27 Nov 2023 ○ Weighing slip – sales No. D0002035 dated on 21 Nov 2023 ○ Weighing slip – sales No. D0002036 dated on 24 Nov 2023 ○ Weighing slip – sales No. D0002033 dated on 19 Nov 2023 and Delivery Order No. 13812 dated on 19 Nov 2023 <p>The mandatory information has completed and presented on some documents above. Those mandatory information i.e :</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 (IP/MB/the approved abbreviations) • The quantity of the products delivered • Any related transport documentation • A unique identification number 	Yes
Outsourcing Activities		
3.8.9	<p>Ownership of the products belong to UPB until reached customer destination. The mill is not outsourcing its operation to independent third parties. However, the UPB have agreement with CPO transporters that requires contractor(s) to comply with RSPO Supply Chain Standard for handling RSPO certified palm oil products, may</p>	Yes



	<p>subject to any audits including verification by the appointed third-party assurance body.</p> <p>Transportation process for PK product in Ulu Basir POM is provided by buyer so that there is not agreement/contract between UPB and PK transporter.</p>	
3.8.10	<p>The mill have record of the name and contact detail of transporter used for the physical handling of RSPO certified oil palm products by completely such as company name, PIC, address, contact number and email. Contractor as CPO transporter from Ulu Basir mill to buyer on Year 2024 is Excellent Insight Sdn Bhd, Sakthy Transport Sdn Bhd, and Sri Naresh Agency.</p> <p>Whereas, transportation process for PK product is provided by buyer as refer to basis delivery section (EXW Up Mills) on sales confirmation.</p>	Yes
3.8.11	<p>The UPB has not appointed new contractor on Year 2024 or not hired new contactor if compared with previous year/assessment. On year 2024, Uji Sakti Sdn Bhd has instructed by UPB to handling by physically for CSPO from UIE POM to buyer so that not handling from Ulu Basir POM to buyer. On previous year, Uji Sakti Sdn Bhd has instructed by UPB to handling by physically for CSPK from Jendrata POM to buyer. Auditor has communicated with transporter about it and transporter has informed that the information is correct.</p> <p>Based on condition above so UPB has not been informed to CB about the name and contact detail of new contractor.</p>	Yes
Record Keeping		
3.8.12	<p>Ulu Basir POM have complete, up to date and accessible records and reports covering all aspects of RSPO SCC requirements as shown is weighing slip – FFB receipt, estate-division progeny summary report (FFB product), weighing slip – sales, sales report, delivery order record, delivery summary report, daily production report, mill supply chain accounting system spreadsheet, sales confirmation, refreshment SCCS training, internal audit report & management review report, agreement/contract about transportation of product, payment document relate of transportation activity, invoice from UPB to buyer, etc.</p> <p>Responsible party for maintaining the records & documents above is the head of oil mill, commodities / shipping & logistic department, registered office and weighbridge operator.</p> <p>The retention period for traceability record are minimum 3 years as per the SOP for RSPO Supply Chain (RSPO Supply Chain Module D</p>	Yes



	<p>– CPO Mills : Identity Preserved, Rev.10 dated on 01 Oct 2022, section/item 16.0 – record keeping).</p> <p>The sustainability team has recorded and reported all transactions (the receipt of RSPO certified FFB and production & sold of RSPO certified product (CPO & PK)) on real-time basis because Ulu Basir POM was implemented Identity Preserved (IP) as their supply chain model. Auditor has verified record/document as sample is :</p> <ul style="list-style-type: none"> certified FFB receipt period of March 2024, Sales Confirmation dated on 08 August 2023, Instruction of shipment from Registered Office-UPB to Ulu Basir Engineering Department for shipping date on 13 March 2024, Weighing slip – sales No.D0002197 to 2202 (6 dispatch activities) dated on 13 March 2024, sales report period of 13 March 2024, and delivery order No.13981 to 13986. certified FFB receipt period of June 2023, Sales Confirmation dated on 01 June 2023, Weighing slip – sales No. D0001743, 1725, 1726, 1750, 1751, sales report period of 14, 16, 23 & 26 June 2023, delivery order No.13553 to 13557. certified FFB receipt period of November 2023, Sales Confirmation dated on 20 November 2023, Weighing slip – sales No. D0002033, 2035, 2036, 2047 & 2055, sales report period of 21, 24 & 27 November 2023, delivery order No.13812 to 13816. 	
Extraction Rate		
3.8.13	<p>Conversion rate is based on production volume. Verified the Monthly Crop Report which has information of FFB processed, CPO produced + OER and PK produced + KER. Example data sighted in mill monthly progress report :</p> <p>Month : May 2024 FFB Processed : 4,010.10 mt CPO production : 826.32 mt PK Production : 144.09 mt OER : 20.61% KER : 3.59%</p> <p>Month : June 2023 to May 2024 FFB Processed : 76,513.19 mt CPO production : 17,216.44 mt PK Production : 3,452.61 mt OER : 22.50% KER : 4.51%</p>	Yes



3.8.14	Conversion rate of mill daily production recorded on daily basis as per documented in mill production report.	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>UPB 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 / CSPK in the Palm Trace during physical deliveries and records are maintained accordingly. 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. All certified volume are sold as RSPO certified.</p> <p>Sample of transaction on palmtrace as belows :</p> <ul style="list-style-type: none"> No. TR-ea150f25-61b7 : CSPO product with volume of 159.16 MT, buyer is Unitata Berhad, supply chain model is IP, shipping date is 13 March 2024 and status is confirmed. No. TR-0c8a7b3f-4c73 : CSPK product with volume of 208.12 MT, buyer is Unitata Berhad, supply chain model is IP, shipping date is 30 June 2023 and status is confirmed. No. TR-475f9631-9b4a : CSPK product with volume of 164.33 MT, buyer is Unitata Berhad, supply chain model is IP, shipping date is 24 November 2023 and status is confirmed. <p>Sample of transaction has complied to role of indicator it because shipping announcement was available, delivery documents has connected with shipping announcement and status of transaction on palmtrace was confirmed by buyer.</p>	Yes
Claims		
3.8.17	UPB has obtained "RSPO Trademark License" number 1-0004-100-00 and has complied to RSPO rules on market communications and claims, 2022 (point of 4.2.E general corporate communication) because UPB has carried out corporate communication that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO and putting the RSPO trademark on UP website (https://unitedplantations.com/certifications/RSPO). Whereas, Ulu Basir POM have not and not using "RSPO Trademark License".	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>UPB 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 as follows: For internal stakeholders, sighted the training record sighted on RSPO Policies on 02/01/2023 attended by 21 workers (harvesters and general workers). For external stakeholders, the meeting was collaborated between UPRIVER Business Unit on 19/5/2023 that was attended by more than 81 stakeholders. Based on interview result with employee, transporter & plantation samples that they has understood and aware about human right.</p>	Yes
4.1.2	As per interview with workers, transporters & plantation near estate, it has been confirmed that the management of mill and estate did not instigate violence or use any form of harassment in their operations or no any discrimination from company to them.	Yes
4.2.1 (C)	<p>UPB 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 30days 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 	Yes



	<p>stakeholders and Estate / Mill Manager from Company Secretary</p> <ol style="list-style-type: none"> Grievance presented to UPB Executive Committee Action to be taken is recorded and stakeholders to be kept informed monthly on the status. Progress review by UPB Executive Committee until resolution The outcome of the resolutions is documented, and stakeholder be informed officially. 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> <ol style="list-style-type: none"> Within 4 working days of a grievance arising, employee to raise to immediate superior. 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 hold a meeting within 7 working days between Union Committee and executive /staff to whom the workers are responsible. If remain unsettled, the grievance shall be discussed between the Manager and union committee / workers welfare committee within a further 7 working days. 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	The management has taken initiative to establish handbook which explain the complaint procedure in 8 different languages. 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.	Yes
4.2.3	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 as through verbal, email, meetings and others. The mill's and estate's stakeholder Logbook was sighted.	Yes
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	UPB has CSR project in group level 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 given requests from SMK Ulu Bernam regarding providing bus on 19 February to 29 February 2024.	Yes
4.4.1 (C)	<p>The Mill is situated under Ulu Basir Estate Registration No 23643, Lot Number 22 covering 7.28 hectare from the total Lot size of 1838 hectare.</p> <p>The Ulu Basir Estate is consisting of 2 divisions namely Division 1 and Division 2. Sighted Lot No. 22 is divided into 2 Estates, Ulu Basir – 1129.17 ha and Changkat Mentri (under Ulu Bernam Optimill complex)– 708.83 ha. Estate has a valid land title indicating correct land title terms which specifies the purpose of the planting of the oil in the respective land.</p> <p>Sighted payment of Quit Rent made available for year 2024 and no land expansion nor sold from previous assessment. Sighted no discrepancy against title area.</p>	Yes
4.4.2	<p>There is no land dispute in the visited estates as the land belongs to UPB and land ownership documents verified for evidence. There is no evidence of land extension nor new acquisition since from previous audit.</p> <p>Based on interview with Manager of Kiara Jubli estate that he has confirmed that no land dispute between Ulu Basir estate and Kiara Jubli estate.</p>	Yes
4.4.3 (C)	<p>A Safe Operation Manual (SOP) dated on 10/12/2007 is made available for boundary markers monitoring and Ulu Basir Estate is maintaining a GPS coordinates against their boundary stone markers of their land area.</p> <p>Sighted records of Monthly Checklist of Boundary and interview the Estate Assistant on the census process. There is no evidence of land extension nor new acquisition since from previous audit</p>	Yes
4.4.4	Sighted SOP for Land dispute Settlement with the latest revised date of 27/10/2020 is applicable if any arising issues from the local communities neighboring the estate or stakeholders or during land surveying process by authorized agencies. There is no land dispute in the visited estates as the land belongs to UPB and land ownership documents verified for evidence. There are no communities nor individual has any implications for the legal status of their land.	Yes
4.4.5 (C)	There is no evidence of land extension nor new acquisition since from previous audit.	Yes



4.4.6	There is no land dispute for Ulu Basir Estate as the land belongs to UPB and land ownership documents verified for evidence.	Yes
4.5.1 (C)	<p>The Mill is situated under Ulu Basir Estate Registration No 23643 and the details are :</p> <ul style="list-style-type: none"> • GRN 00161488 – Freehold – 895 Ha • GRN 00161499- Freehold – 1838 Ha • PN 00388733 – Leasehold – 2212 Ha • PN 00388754 – Leasehold – 256 Ha • PN 378070 – Leasehold – 163.30 Ha • PN 313567 - Leasehold Changkat Menteri – 11.40 Ha <p>Estate has a valid land title indicating correct land title terms which specifies the purpose of the planting of the oil in the respective land and payment of Quit Rent made available for year 2024.</p>	Yes
4.5.2 (C)	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent	N.A
4.5.3	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.5.4	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.5.5	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.5.6	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.5.7	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.5.8 (C)	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A



4.6.1 (C)	<p>UPB 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>	Yes
4.6.2 (C)	<p>Procedure for calculating and distributing fair compensation as per Indicator 4.6.1</p>	Yes
4.6.3	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.</p>	N.A
4.6.4	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.</p>	N.A
4.7.1 (C)	<p>UPB 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>	Yes
4.7.2 (C)	<p>UPB 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>	Yes
4.7.3	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land</p>	N.A



	for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	
4.8.1	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.8.2 (C)	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.8.3	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
4.8.4	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	N.A
Principle 5: Support smallholder inclusion		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
5.1.1	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.	N.A
5.1.2 (C)	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	N.A
5.1.3 (C)	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	N.A
5.1.4 (C)	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	N.A
5.1.5	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	N.A



	FFB D/O, reveals there is no purchase of FFB from outside parties or smallholders	
5.1.6(C)	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	N.A
5.1.7	The calibration record of weighbridge is made available as: <ul style="list-style-type: none"> ATI-ATK 000970 (60MT) dated on 08/07/2023 ATI-ATK 055272 (50MT) dated on 08/07/2023 	Yes
5.1.8	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	N.A
5.1.9 (C)	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	N.A
5.2.1	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	N.A
5.2.2	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	N.A
5.2.3	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	N.A
5.2.4 (C)	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	N.A
5.2.5	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	N.A



	FFB D/O, reveals there is no purchase of FFB from outside parties or smallholders	
Principle 6: Respect workers' rights and conditions		
Indicator	Summary of Findings	Compliance (Y/N) and NC#
6.1.1 (C)	<p>UPB 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. The Non-discrimination and equal opportunities policy has been stated under objectives element bullet No 2 and 3 in Human Right Policy. The policy is available in the company's website, displayed at the mill and estate office wall and notice boards.</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 communicate through the briefing as follows :</p> <ul style="list-style-type: none"> For internal stakeholders : <ul style="list-style-type: none"> POM : The briefing was conducted dated on 16/5/2024 to 40 participants by Senior Assistant Engineer (Mr. Muhammad Shafiq Naslah) Estate : The briefing on Policies, SOPs being incorporated with all the trainings conducted throughout the years. Sample as follows : Safe Spraying Technique/IPM/PPE dated on 3/1/2024 and Railway Safe Operating Procedure/PPE Usage dated on 28/2/2024 For external stakeholders : The meeting was collaborated between UPRIVER Business Unit dated on 25/4/2024 to 99 stakeholders. 	Yes
6.1.2 (C)	<p>The recruitment of foreign workers is adhering to SOP for Recruitment of Guest Workers updated on 31/3/2020 Revision 3. 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" and appendix 1 mentioned "Recruitment fees paid by the Company".</p> <p>Interview HR Senior Manager on the ethical recruitment policy and what are the measures take to ensure zero recruitment fee is implemented. Further verification done through interview with Indonesian, Bangladeshi and Indian workers confirmed that there are no recruitment fees paid.</p>	Yes



	<p>All employments been interview confirmed they are freely and voluntary enter into employment. All workers in the sampled estates and mill have valid employment contract which been signed by both employee and employer.</p> <p>The Management have recruited local and foreign workers as tabulated below :</p> <ul style="list-style-type: none"> • POM : Year 2023 is 3 employees (local) and Year 2024 is 2 employees (local) • Estate : Year 2023 is 2 employees (local) & 22 employees (foreign). Whereas, Year 2024 is 18 employees (foreign) <p>Sighted, Individual Dossier Checklist of each foreign worker prior to recruitment. The checklist containing 16 parameters/elements. The latest revision was on 6/3/2024.</p> <p>All the respective workers maintaining of their "Passport Save Keeping"</p> <p>Management has provided a safe deposit box that installed at their quarters.</p> <p>In case of renewal of work permit, the worker will submit their passport to office together with acknowledgment letter call Handing Over New Key for Safe Deposit Box or Metal Cupboard with Factory Built -In Safe Deposit Box and Returning Passport to Guest Workers from Centralised Lockers that mutually agreed and signed by both parties. The Estate / Mill will return the passport to workers upon completion the process of renewal.</p>	
6.1.3	<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 estate within UP upriver Business Unit as per sighted as following :</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Recruitment Of Executives And Non-Executive Staff; Rev. # 1; Date: 31/3/2020 • Standard Operating Procedures – Recruitment Of Local Workers; Rev. # 1; Date: 31/3/2020 • Standard Operating Procedures – Recruitment Of Guest Workers; Rev. # 3; Date: 31/3/2020 <p>Ulu Basir POM and Estate can demonstrate that recruitment, selection is based on skills, capabilities, and medical fitness. For foreign workers, interview has been conducted by HRSS at origin countries and medical assessment has been done through FOMEMA. While for local workers, medical check-up done hospital assistant. Review of recruitment document such as interview records, medical</p>	Yes



	<p>check-up records and interview with sample confirmed the statement.</p> <p>Sample of newly recruited workers as per below :</p> <ul style="list-style-type: none"> • POM : <ul style="list-style-type: none"> ○ Employee Number 10xxx (MN), Malaysia joined on 15/1/2024. ○ Employee Number 10xxx (MAS), Malaysia joined on 15/1/2024. • Estate : <ul style="list-style-type: none"> ○ SI, Bangladesh joined on 28/1/2024 ○ MK, Bangladesh joined on 28/1/2024 ○ UKH, Bangladesh joined on 17/5/2024 ○ MFM, Bangladesh joined on 17/5/2024 ○ MAH, Bangladesh joined on 17/5/2024 ○ SKR, Bangladesh joined on 17/5/2024 <p>Verified the Induction Training Programme for 5 Guest Workers from Bangladesh dated 10/6/2024. The workers were arrived on 17/5/2024.</p> <p>Among the information briefed were MAPA/NUPW Collective Agreements, UPB Sustainability Policies and etc. The Logbook for induction course being signed by the worker and trainer.</p>	
6.1.4	<p>Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment.</p> <p>They will inform to the Hospital Assistant if they are pregnant for management to initiate Medical Removal Protection Programme or job transfer. Based on the interview with the Gender committee, the practice of Pregnancy testing is not applied in this estate.</p> <p>There is no routine pregnancy test has been done or in practice.</p>	Yes
6.1.5 (C)	<p>Gender committee is in place at each operating unit under United Plantations Berhad's Upriver Business Unit as specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>Appointment of the committee members and organization chart were seen together in the meeting minutes and supporting records for the requests raised by the female workers.</p> <p>A combined Gender Committee has been established between Ulu Basir Estate, Ulu Basir POM and Changkat Menteri Estate. The committee is chaired by Mdm Chitra Nadesan with 19 committee members.</p> <p>Latest Gender Committee Meeting was conducted on 13/5/2024 and attended by 19 participants. Agenda of the meeting includes :</p>	Yes



	<ul style="list-style-type: none"> Any issues arise with regards to the sexual harassment / gender committee. The chairman reminded on the openness to lodge the cases should there is any. The chairman briefed on the mechanism of handling any sexual harassment cases. Brief on benefits for New Mother <p>Based on the meeting outcome, there is no sexual harassment, domestic violence and gender discriminations. No female worker with pregnancy, new mothers or delivered baby during period of assessment.</p>	
6.1.6	<p>The wages' structure is based on MAPA/NUPW Agreement, 2019 for estate and mill. They were paid according to the Minimum Wage Order (MWO) 2022 without any discrimination. Overtime and work on rest day were paid according to Employment Act 1955.</p> <p>Sighted the pay slips clearly shows the calculations of gross salary, all deductions and net salary. 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. The net pay received between RM 1,903.03 to RM 3,612.59 (POM) and RM 1,516.47 to RM 3,852.22.</p> <p>Sample of worker's salary slip on January & March 2024 is :</p> <ul style="list-style-type: none"> POM : RST (Employee No : 10xxx), KP (Employee No : 10xxx), KSS (Employee No : 10xxx), SAS (Employee No : 10xxx), AWL (Employee No : 10xxx), ATAA (Employee No : 10xxx), VW (Employee No : 10xxx) & MHS (Employee No : 10xxx). Estate : MHR (Employee No : 188xxx), AR (Employee No: 183xxx), SPD (Employee No: 186xxx), AKM (Employee No: 181xxx), AU (Employee No: 181xxx), PL (Employee No: 186xxx), MT (Employee No: 187xxx) & AZ (Employee No: 164xxx). 	Yes
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>Pays and benefits has been outlined in 2 document which are collective agreement with MAPA/NUPW and Employment Contract. For AP/watchmen that salary scale is based on MPOA Security Sdn Bhd.</p> <p>All the workers are directly employed by United Plantations Berhad and each of them are having their own personal file. As per</p>	Yes



	interview with sample workers, it has been confirmed that the employment contract has been explained to the workers and they can demonstrate their understanding on the contract	
6.2.2 (C)	<p>Guest workers, India, Bangladeshi, Nepal are recruited with three (3) years contract except for Indonesian workers where the contracted with tow (2) years. Local workers are on a long-term employment. No kind of discrimination was noted.</p> <p>Employment contract has been established in 8 different languages which details up payment and condition of employment such as 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>Payment of workers salary has been details up in pay slips which has been provided to the workers. Sample taken on the following :</p> <ul style="list-style-type: none"> • POM : RST (Employee No : 10xxx), KP (Employee No : 10xxx), KSS (Employee No : 10xxx), SAS (Employee No : 10xxx), AWL (Employee No : 10xxx), ATAA (Employee No : 10xxx), VW (Employee No : 10xxx) & MHS (Employee No : 10xxx). • Estate : MHR (Employee No : 188xxx), AR (Employee No: 183xxx), SPD (Employee No: 186xxx), AKM (Employee No: 181xxx), AU (Employee No: 181xxx), PL (Employee No: 186xxx), MT (Employee No: 187xxx) & AZ (Employee No: 164xxx). <p>All the relevant documents related to the Contractor worker's payment slip and contract agreement being assessed as sample below :</p> <ul style="list-style-type: none"> • Excellent Insight Sdn Bhd (Reg. No. 296170-M) have the scope of work is hiring vehicle or using their vehicle, if any, to transport CPO from the Hirer's POMs to the destinations as stipulated by the hirer with period of contract is annually (1st January to 31th December 2024). Sample of contractor's employees for month of May 2024 is tanker driver with nett salary/pay is compliance to minimum wage. • Sakthy Transport Sdn Bhd have the scope of work is hiring vehicle or using their vehicle, if any, to transport CPO from the Hirer's POMs to the destinations as stipulated by the hirer with period of contract is annually (1st January to 31th December 2024). Sample of contractor's employees for month of May 2024 is tanker driver with nett salary/pay is compliance to minimum wage. <p>There is not contractor being engaged in Estate. Thus far, no issues on shortage of wages which does not meet the terms of contract of employment.</p>	Yes



6.2.3 (C)	<p>Working hours is at 7 and half hours daily (45 hours per week regulation), 14 days of annual leave and increasing of maternity leaves from 60 to 90 days for female workers. Stated in the employment contract, termination process is 1 months' notice given by either party.</p> <p>Records of pay slip, thumb print at Mill 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.</p>	Yes
6.2.4 (C)	<p>Ulu Basir Complex Management has provided adequate housing where foreign workers have been allocated in a unit with 2 rooms and 1 toilet with 4 persons per house for foreign. While for local workers, they have been allocated a house per family</p> <p>Line site inspection has been conducted on bi-weekly basis by the hospital assistant, Mr D. Saravana Kumar and VMO. Furthermore, the mill staff also conducting inspection weekly. Sample has been taken for months April, May and June 2024.</p> <p>Domestic waste for mill and estate been collected alternate days and disposed at composting pit Field 32, Changkat Mentri Estate</p> <p>Water has been supplied by Mill Treatment Plant and electric by TNB for 24hours/ day and subsidized free to workers. Medical facilities have been established in the housing area where hospital assistant is available working hours and during emergency cases. The nearest school located at Sekolah Kebangsaan Ulu Bernam, SMK Ulu Bernam and SJK(T) Ladang Ulu Bernam the management provided free transport for school kids. Surau and temple has been established at Ulu Basir complex land and cost of construction supported by the management. Sport facilities such football field, takraw, volleyball is also available at the housing area. None of the interviewed workers mentioned that the facilities provided are not satisfactory.</p>	Yes
6.2.5	<p>The nearest town is Sabak Bernam about 30KM. Two sundry shop is available within the mill and estate.</p> <p>Pricing monitoring has been done by the management to ensure that food price is reasonable and affordable and confirmed by the auditor during the site visit and interview with sample workers. It has been verified that price is reasonable and affordable.</p>	Yes



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).</p> <p>As a summary, the prevailing wages as follows :</p> <table border="1"> <tr> <td></td><td>Ulu Basir Mill (RM)</td><td>Ulu Basir Estate (RM)</td></tr> <tr> <td>Local</td><td>2,412.30</td><td>2,497.80</td></tr> <tr> <td>Foreign</td><td>3,072.19</td><td>2,689.65</td></tr> <tr> <td>Monash</td><td colspan="2">1735.47</td></tr> <tr> <td>Source Country</td><td colspan="2">1088.51 – Bangladesh 791.27 – India 1183.91 - Indonesia</td></tr> </table>		Ulu Basir Mill (RM)	Ulu Basir Estate (RM)	Local	2,412.30	2,497.80	Foreign	3,072.19	2,689.65	Monash	1735.47		Source Country	1088.51 – Bangladesh 791.27 – India 1183.91 - Indonesia		Yes
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Source Country	1088.51 – Bangladesh 791.27 – India 1183.91 - Indonesia																
6.2.7	All the core works are performed by permanent check roll employees and full-time employees in Ulu Basir Business Unit. It has been verified that there is no casual and temporary workers has been recruited in Ulu Basir Complex	Yes															
6.3.1 (C)	<p>United Plantations 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. Furthermore, the policy also being relay through the briefing as follows:</p> <p>Internal Stakeholders</p> <p>Ulu Basir POM : The briefing was conducted on 16/5/2024 to 40 participants by Senior Assistant Engineer, Mr. Muhammad Shafiq Naslah</p> <p>Ulu Basir Estate : The briefing on Policies, SOPs being incorporated with all the trainings conducted throughout the years. Sample as follows :</p> <ul style="list-style-type: none"> • Safe Spraying Technique/IPM/PPE dated 3/1/2024. • Railway Safe Operating Procedure/PPE Usage dated 28/2/2024 <p>External Stakeholders</p>	Yes															

	The meeting was collaborated between UPRIVER Business Unit on 25/4/2024 to 99 stakeholders.	
6.3.2	<p>Confirmed during interview with the workers that worker representatives were freely elected among and by the workers themselves.</p> <p>Sighted the meeting on Workers Welfare and Guest Workers at UBED dated 7/3/2024 attended by 2 Management's Representative and 6 Worker's representative from Indonesia, Bangladeshi, Indian and Local</p> <p>As for Ulu Basir Estate, Workers Welfare and Guest Workers being conducted on 29/5/2024 attended by 4 Management's Representative and 10 Worker's representative from Indonesia, Bangladeshi, Indian and Local</p> <p>The management has established workers representative committee as an alternative for the workers and as one of the grievances channels.</p>	Yes
6.3.3	As confirmed by the workers during interview, all workers representatives were freely elected among and by the workers themselves. They comprise various nationalities, and were selected based on experience, communication skills and number of years worked. There is no interference by the management in selection of workers representative.	Yes
6.4.1	<p>United Plantations 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. 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.</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. Furthermore, the policy also being relay through the briefing as follows :</p> <p>Internal Stakeholders</p> <p>Ulu Basir POM : The briefing was conducted on 16/5/2024 to 40 participants by Senior Assistant Engineer, Mr. Muhammad Shafiq Naslah</p> <p>Ulu Basir Estate : The briefing on Policies, SOPs being incorporated with all the trainings conducted throughout the years. Sample as follows:</p>	Yes



	<ul style="list-style-type: none"> • Safe Spraying Technique/IPM/PPE dated 3/1/2024. • Railway Safe Operating Procedure/PPE Usage dated 28/2/2024 <p>External Stakeholders</p> <p>The meeting was collaborated between UPRIVER Business Unit on 25/4/2024 to 99 stakeholders.</p>	
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 database no evidence of workers below 18 at time of recruitment.</p>	Yes
6.4.3 (C)	<p>Review from the master list of workers for Ulu Basir Complex, it was confirmed that there are no young workers has been recruited.</p>	Yes
6.4.4	<p>United Plantations Berhad has established Human Rights Policy approved by Dato' Carl Bek Nielsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Telegu, Hindi, Nepali and Indonesia. 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 anyone whos is less than 18 years old.</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. Furthermore, the policy also being relay through the briefing as follows :</p> <p>Internal Stakeholders</p> <p>Ulu Basir POM : The briefing was conducted on 16/5/2024 to 40 participants by Senior Assistant Engineer, Mr. Muhammad Shafiq Naslah</p> <p>Ulu Basir Estate : The briefing on Policies, SOPs being incorporated with all the trainings conducted throughout the years. Sample as follows :</p> <ul style="list-style-type: none"> • Safe Spraying Technique/IPM/PPE dated 3/1/2024. 	Yes



	<ul style="list-style-type: none"> Railway Safe Operating Procedure/PPE Usage dated 28/2/2024 <p>External Stakeholders</p> <p>The meeting was collaborated between UPRIVER Business Unit on 25/4/2024 to 99 stakeholders.</p>	
6.5.1 (C)	<p>United Plantations Berhad has established Human Rights Policy approved by Dato' Carl Bek Nielsen, Chief Executive Director dated 9/3/2020 is available in English, Bahasa Malaysia, Tamil, Bengali, Te As stated legu, Hindi, Nepali and Indonesia. 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. Furthermore, the policy also being communicated through the briefing as follows:</p> <p>Internal Stakeholders</p> <p>Ulu Basir POM : The briefing was conducted on 16/5/2024 to 40 participants by Senior Assistant Engineer, Mr. Muhammad Shafiq Naslah</p> <p>Ulu Basir Estate : The briefing on Policies, SOPs being incorporated with all the trainings conducted throughout the years. Sample as follows :</p> <ul style="list-style-type: none"> Safe Spraying Technique/IPM/PPE dated 3/1/2024. Railway Safe Operating Procedure/PPE Usage dated 28/2/2024 <p>External Stakeholders</p> <p>The meeting was collaborated between UPRIVER Business Unit on 25/4/2024 to 99 stakeholders.</p> <p>No cases on sexual harassment being reported thus far.</p>	Yes
6.5.2 (C)	<p>United Plantations Berhad has established Gender Policy dated 25/4/2015 signed by Chief Executive Director where they committed to protect the reproductive rights of all employees, especially of women. A Gender Committee collaborated amongst Ulu Basir</p>	Yes



	<p>Estate; Ulu Basir Eng. Dept and Changkat Mentri Estate was formed and lead by Mrs. Chitra Nadesan. Sighted, issues on Protect the Reproductive Rights Of All being discussed in the Gender Committee Meeting dated 13/5/2024.</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. Furthermore, the policy also being relay through the briefing as follows :</p> <p>Internal Stakeholders</p> <p>Ulu Basir POM : The briefing was conducted on 16/5/2024 to 40 participants by Senior Assistant Engineer, Mr. Muhammad Shafiq Naslah</p> <p>Ulu Basir Estate : The briefing on Policies, SOPs being incorporated with all the trainings conducted throughout the years. Sample as follows :</p> <ul style="list-style-type: none"> • Safe Spraying Technique/IPM/PPE dated 3/1/2024. • Railway Safe Operating Procedure/PPE Usage dated 28/2/2024 <p>External Stakeholders</p> <p>The meeting was collaborated between UPRIVER Business Unit on 25/4/2024 to 53 stakeholders inclusive 19 Management representative.</p>	
6.5.3	The Estate and Mill have no new mother (recently given birth, breast feeding). This was confirmed with the Hospital Assistant and Gender Committee Representatives	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 for grievance handling.</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. 	Yes



	<ol style="list-style-type: none"> 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> <ol style="list-style-type: none"> 1. The grievance to be settled within 7 working days. 2. If the matter remains unsettled within a further 7 working days, the appropriate union committee shall make formal representation to the estate / mill Management. 3. 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. 4. If remain unsettled, the grievance shall be discussed between the Manager and union committee / workers welfare committee within a further 10 working days. 5. 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>The procedure stated that all grievances are formally recorded at point of receipt and settled as soon as possible but not more than 30 days and grievances acknowledged by letter within 7 workings days to stakeholder and POM manager / head of department from the company secretary.</p> <p>Sighted a Grievance Redressal Procedure is displayed at the facilities notice board, company's website, published in the Company Annual report and attached in the Employment contract, Employees handbook.</p> <p>There is no complaint of harassment has been received by the management for previous audit period and it has been further confirmed by auditor through complaint records, interview with workers and gender committee.</p>	
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6.6.1 (C)	<p>Based on interviews with the workers, and observations made, the following were verified :</p> <p>a. Retention of documents : All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. It has been confirmed during site visit to line site where verification passport has been kept at their house.</p> <p>b. Charging of recruitment fee : Workers are not charged any recruitment fees. This is clearly stated in the contracts between United Plantations Berhad with the recruitment agents. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees. Other than that, newly recruited workers have been paid RM150 to buy their own needs.</p> <p>c. Involuntary overtime : Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work.</p> <p>d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts by giving 1 Month Notice either party. This was confirmed during interviews with workers.</p> <p>e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview that confirmed that there is no loan/borrowing money given by the management to the workers.</p> <p>f. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by the management via Bank Simpanan Nasional and can be withdrawn at the nearest ATM and sighted evidence of payment that has been signed by the workers.</p> <p>There is evidence that there were no workers' wages being withheld by the management. It has been further confirmed through interview with the workers</p>	Yes
6.6.2 (C)	<p>United Plantations Berhad maintained the current revise Guest Workers Policy with signed by Dato' Carl Bek Nielsen, Chief Executive Director (CED) updated 31/12/2021.</p> <p>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". 	Yes



	<ul style="list-style-type: none"> - 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>UP's Commitment to Ethical Recruitment Fees. We are committed to paying the recruitment fees in the source countries and in Malaysia as per the enclosed table in Appendix 1.</p> <p>Remediation and corrective actions will be taken if issues are found. In the event of a claim arising during the verification of the recruitment process the company shall :</p> <ul style="list-style-type: none"> • Commence an immediate investigation • Responsibilities in the event of any breaches regarding ethical Recruitment fees : <ul style="list-style-type: none"> a) If the breach is by UP due to failure to adhere to our Guest Workers' Recruitment SOP, then the aggrieved guest worker will receive compensation from UP. b) If the breach is by an Accredited Recruitment Agent will be required to compensate the aggrieved guest worker. If such an action is not undertaken by the Accredited Recruitment Agent, then the Company will suspend any relationship with agent until the matter has been rectified. • Accredited Recruitment Agencies are responsible for monitoring any of their possible collect any recruitment related fees from the workers. If any such fees are found to be collected from the workers, the Company will require the Accredited Recruitment Agent to reimburse the said amount to the worker. • The company will terminate all contracts or partnerships with any Accredited Recruitment Agent who have been found to be non-compliant with the Company policies after due investigations and warnings. • We will not cover any forms of bribes, tips or tributes paid by the Guest Worker at any point during the recruitment process or any other items not included in Appendix 1 as explicit cautions and briefings related to legitimate recruitment costs have been given by our toll-free call center and through our Accredited Recruitment Agents. 	
6.7.1 (C)	OSH Organization chart 2024 is made available at Ulu Basir Complex.	Yes



	<p>Person in-charge of Occupational Safety and Health at UBED is the respective Resident Engineer, Mr. Nathan Raman dated 31/1/2022. The appointment letter signed by Mr. P.Seker, Director of Engineering (Upstream)</p> <p>OSH Meeting being conducted periodically as per Regulations, detail as below :</p> <table><tr><th>Year</th><th>No</th><th>Ulu Basir POM</th><th>Ulu Basir Estate</th></tr><tr><td rowspan="2">2023</td><td>3</td><td>12/9</td><td>21/9</td></tr><tr><td>4</td><td>28/12</td><td>29/12</td></tr><tr><td>2024</td><td>1</td><td>14/3</td><td>6/3</td></tr></table> <p>The Agenda of the Meeting includes:</p> <ul style="list-style-type: none">i. Review of OSHA Policyii. Review of HIRARCiii. Review of CHRAiv. Annual Medical Surveillancev. Safety performancevi. PPEvii. Training in related to OSHviii. Emergency response planix. Workers Safety Inspection	Year	No	Ulu Basir POM	Ulu Basir Estate	2023	3	12/9	21/9	4	28/12	29/12	2024	1	14/3	6/3	
Year	No	Ulu Basir POM	Ulu Basir Estate														
2023	3	12/9	21/9														
	4	28/12	29/12														
2024	1	14/3	6/3														
6.7.2	<p>Emergency Response Plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted. There is formation of ERP Team & ERP for all the identified incidences.</p> <p>In addition, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates and mill.</p> <p>Emergency Response Plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board as per UPB Occupational Safety and Health Manual Chapter V : Emergency Response Plan and Chapter XII : Accident Reporting and Investigation Procedure.</p> <p>First Aid and CPR training for UBED was conducted on 9/3/2024 by Estate Hospital Assistant. The training attended by 8 participants.</p> <p>As for, Ulu Basir Estate the CPR Training was conducted on 9/6/2024 by Mr. Karunamoorthi from Power Solutions Training Management. The training attended by 24 participants.</p>	Yes															



	The First Aid Box is available at workplace and periodical replenish programme being plan and the process was cross verified with Hospital Assistance.	
6.7.3 (C)	<p>United Plantations Berhad Personal Protective Equipment (PPE) Management Procedure, Mill & Estate provided appropriate PPE for all workers in their operations. Person in-charge of in issuing PPE is the Storekeeper. PPE Issuance and replacement record sighted for sample workers as following :</p> <ul style="list-style-type: none"> - Staff/AP - General Workers - Harvesters <p>The type of PPE is included in the HIRARC assessment chart for all type of job activities.</p> <p>During Estate visit, sighted the workers have been trained with safety and the workers wear the PPE required by his/her works. Interview with workers during site visit to mill and estates found the workers are provided with PPE appropriate to the nature of work. Site visit to pesticide / chemical store, sighted the SDS are displayed clearly and the PICs were trained on the contents. The estate has a changing room / shower room for sprayer and manurer to change their clothes before leaving to home.</p>	Yes
6.7.4	<p>There is a centralize clinic available in Ulu Basir Estate which administrating by Hospital Assistant. The clinic also caters for Ulu Basir POM. Workers are covered under SOCSO scheme. For critical and emergency, the workers to be refer to Ulu Bernam Group Hospital. Seen the SOCSO scheme payment samples as per SOCSO 8A form sample for January and March 2024 contributions; Sample taken on the following workers :</p> <ul style="list-style-type: none"> • Ulu Basir POM : Employee No: 10450, Employee No: 10644, Employee No: 10519, Employee No: 10595, Employee No: 10620, Employee No: 10616, Employee No: 10652 & Employee No: 10588 • Ulu Basir Estate : Employee No : 188355, Employee No : 183044, Employee No : 186412, Employee No : 181572, Employee No : 181613, Employee No : 186821, Employee No : 187459 & Employee No : 164070 	Yes
6.7.5	Occupational injuries and LTA are monitor by the Hospital Assistant at Estate and Mill. Records on Lost Time Accident (LTA) metrics at mill/estates had been verified and JKPP 8 been submitted to DOSH in timely manner.	Yes



	Ulu Basir	Date Submission of JKPP 8	No of Cases	LTA Days		
	Estate	13/1/2024	10	285		
	Mill	25/1/2024	3	164		
Principle 7: Protect, conserve and enhance ecosystems and the environment						
Indicator	Summary of Findings				Compliance (Y/N) and NC#	
7.1.1 (C)	<p>There is IPM plan available at the estate. Implementation of IPM is based on SOP No. S2, Integrated Pest management (IPM). The IPM concept identified in the documents includes planting of beneficial plant, natural control agents, surveillance and monitoring, enumeration census, sampling palms, treatment, critical threshold levels, chemical control, barn owl for biological control.</p> <p>The estate has established list of IPM activities including Establishment of Beneficial plant, Rat census, Rat bait application, Barn Owl Census, Bag worn census and Treatment.</p> <p>For prevention of bagworm in the estate, the management is planting beneficial flowering plants as per sighted during estate site visit. Example species planted:</p> <ol style="list-style-type: none"> 1. Cassia cobanensis 2. Antigonon leptopus 3. Euphorbia heterophylla 4. Celosia sp (foxtail) 5. Tunera subulata 6. Carambola (star fruit) <p>Barn owl census is conducted on quarterly basis. The estate has conducted latest Barn Owl Censuses in first quarter as per report dated 17th April 2024. Based census finding there are total 147 boxes with 84 adults barn occupants, 23 eggs and 12 chicks.</p> <p>Rat census is conducted on monthly basis. Sighted summary for rat census for May 2023. Based on SOP No.3, under clause 3.1 Oil Palm Pest management, rat baiting is to be done when the damage density > 9 % of palm. Example of record sighted include :</p> <ul style="list-style-type: none"> • Field No. : 30 (Div.1), Date of census: 8/6/2024 & Damage Density % : 3.72 • Field No. : 50 (Div.1), Date of census: 4/6/2024 & Damage Density % : 7.68 				Yes	



	<p>Bagworm census is conducted on monthly basis. Sighted summary of bagworm census conducted for May 2023. Based on SOP No.2, under clause S2.8 3.1 Critical Threshold for Caterpillars, treatment to be done when number of larva per frond reaches 10 for bagworms. Example of record sighted include :</p> <ul style="list-style-type: none"> Field No. : 43 (Div.2), Date of census: 12/5/2024 & Average prond: 0.31 Field No. : 32 (Div.2), Date of census: 13/05/2024 & Average Prond 0.42 	
7.1.2	<p>The Global Invasive Species Database is a free, online searchable source of information about alien and invasive species that negatively impact biodiversity.</p> <p>According to Sustainability Manager Mr Lee, the estate management regularly for any invasive species using the CABI.org web search and as this audit period there is no invasive for the state. Based on records sighted, the estate has not planted any beneficial plant which is identified as invasive species in 'cabi.org' website.</p>	Yes
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 5th February 2020 to compliance to Zero Burning policy (1989). The estate has done oil palm replanting in year 2018. The estate has replanting procedure SOP no.2 which prohibits use of fire for clearing old palm trees. The land preparation is by pre-lining for felling and chipping.</p>	Yes
7.2.1 (C)	<p>Justification for pesticide usage for the estate have been specified in document titled". The document has identified name of Chemical used in the estate, purpose, frequency and Concentration of active ingredient.</p> <p>The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species and the effectiveness of killing factor for each chemical in the field.</p> <p>Blanket spraying is also not practiced by the estate and soft grasses were maintained in the field. It had also been the practice that insecticides and rat baits are used only after a threshold level has been exceeded.</p> <p>The management encourage establishment of biological control as per IPM plan. The implementation in the field is consistent with the SOP operation Guidelines in Integrated Pest and Disease</p>	Yes



	management of oil palm and part of strategic to minimize the usage of pesticides	
7.2.2 (C)	<p>Estate maintained record pesticide usage in document titled Pesticide Usage Return. Sighted the list of pesticide used for 1st Trimester 2024 (1st Jan until 31st March 2024) :</p> <ul style="list-style-type: none"> Chemical Name :Metsulfuron Methyl, AI Name : Malban 60, Percentage AI : 60.00 % & Field Size : 5220.22 HA Chemical Name :Triclopyr butotyl, AI Name : Kenlon, Percentage AI : 31.1 % & Field Size : 562.50 HA 	Yes
7.2.3 (C)	<p>Blanket spraying is also not practiced by the estate and soft grasses were maintained in the field. It had also been the practice that insecticides and rat baits are used only after a threshold level has been exceeded.</p> <p>The management encourage establishment of biological control as per IPM plan. The implementation in the field is consistent with the SOP operation Guidelines in Integrated Pest and Disease management of oil palm and part of strategic to minimize the usage of pesticides</p>	Yes
7.2.4	There is no evidence of prophylactic pesticides is been used within the estate sighted during site visit as well as during interview held with workers.	Yes
7.2.5	<p><u>Ulu Basir POM</u></p> <p>Sighted document "List of Hazardous Chemicals to Health" in the chemical register prepared by mill senior assistant Engineer Mr Muhamad Shafiq dated 01st January 2024. There is no pesticide categorized as World Health Organization Class 1A or 1B is used by POM. The chemical register has covered all the chemical used for :</p> <ol style="list-style-type: none"> Raw water treatment Boiler water treatment Laboratory chemicals Kernel plant Lubricants and crease <p>Sighted memo issued by the company CEO Dato' Carl Bark-Nielsen dated 08/03/2021 on the cease of the purchase of Class 1A & 1B chemicals. During the field visit, it's confirmed that there is no Class 1A and 1B chemical has been used in the estate operation.</p> <p><u>Ulu Basir Estate</u></p> <p>Sighted document "List Of Hazardous Chemicals To Health" in the chemical register prepared by the estate management. There is no pesticide categorized as World Health Organization Class 1A or 1B is used by the estate.</p>	Yes



	<p>The chemical register has covered all the chemical used in the</p> <ol style="list-style-type: none"> 1. Storekeeper 2. Premix 3. Herbicides sprayers (mature & immature) 4. Pesticides sprayers (mature & immature) 5. Fertilizer application workers 6. Rat baiting workers 7. Fitters <p>Sighted memo issued by the company CEO Dato' Carl Bark-Nielsen dated 08/03/2021 on the cease of the purchase of Class 1A & 1B chemicals. During the field visit, it's confirmed that there is no Class 1A and 1B chemical has been used in the estate operation.</p>	
7.2.6 (C)	<p><u>Ulu Basir POM</u> SOP for chemical handling is per Chapter IV Section 5, "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" under Occupational Safety and Health Manual last updated and endorsed on 09/11/2021. Training regarding chemical spillage done on 15th May 2024 involved 3 participants.</p> <p><u>Ulu Basir Estate</u> SOP for chemical handling is per Chapter IV Section 5, "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" under Occupational Safety and Health Manual last updated and endorsed on 09/11/2021.</p> <p>The estate has established annual training plan for year 2024 titled "2024 OSH Training Schedule/Sustainability" prepared by Estate Assistant Manager Mr C. Prabhakaran approved OSH Chairman Mr Nek Wahid Nek Harun. The training programme includes training for pesticide handles and pesticide sprayers. Sighted latest training titled "Safe Spraying Technique (Hebicide) IPM/PPE" conducted on 15/3/2024 by Field staff Mr Suhaizan 21 estate pesticide sprayers.</p> <p>During site visit to chemical store noted copies of SDS for chemicals each chemical is retained at site and updated.</p>	Yes
7.2.7 (C)	<p><u>Ulu Basir POM / Ulu Basir Estate</u> Sighted mill's chemical store during site visit. Storage chemicals are as per SOP "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" as per procedure "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" under Occupational Safety and Health Manual last updated and endorsed on 09/11/2021.</p>	Yes



	During site visit to chemical store noted all chemicals are stored in manufacturers' original containers on pallet and neatly stacked. Noted copies SDS for chemicals are retained at site	
7.2.8	<p><u>Ulu Basir POM</u> SOP for waste disposal as per SOP "Transporting, Receiving, Handling, Storage and Disposal of Chemicals" under Occupational Safety and Health Manual last updated and endorsed on 09/11/2021.</p> <p>Mill record of disposal of its contaminated empty chemical containers. Sighted the record of disposal of empty pesticide containers as follows :</p> <ul style="list-style-type: none"> • Date disposal : 23th May 2024 • Consignment Note : 2024052318TJ0W27 • SW Code : SW 305-Spent Lunnricating oil • Quantity : 0.2000 MT • Disposed by : SP Metro (M) Sdn Bhd (license valid until 01st May 2024 – 30th April 2025) <p><u>Ulu Basir Estate</u> Company has established "Triple Rinsing Empty Pesticide Containers" dated 26th May 2016. During field visit to chemical store noted empty pesticide container were triple rinsed and punctured as per the procedure. The estate retains record of triple rinsed container in log book. Based on interviewed with the executive in the estate, some of the spoil empty container has been disposed to authorized contractor and those container in good condition will be reused back as premix or water storage for spraying work.</p> <p>Sighted the record of disposal of empty pesticide containers as follows :</p> <ul style="list-style-type: none"> • Date disposal : 20/03/2023 • Consignment Note : 2023032009BXY6VJ • SW Code : SW 409 Disposed container • Quantity : 0.63 Mt • Disposed by : EDSHA Solution Sdn. Bhd. (DOE License No. 004252 issued on 17/08/2017 and valid until 30/04/2024) 	Yes
7.2.9 (C)	There is no aerial spraying of pesticide practiced by the estate.	Yes
7.2.10 (C)	<p><u>Ulu Basir POM</u> The mill has conducted Chemical Health Risk Assessment (CHRA) in year 2022. Sighted CHRA Report Ref, NO. HQ13/ASS/00/316-2021/030 which the assessment was carried out by Ms Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316) on 11/06/2022.</p>	Yes



	<p>Based on the CHRA Recommendation, the mill has conducted last chemical exposure monitoring was done on 10/08/2022 by Mr Balamurali (DOSH Reg. No. HQ/17/JHI/00/00012) as sighted from "Periodical Chemical Exposure Monitoring Report" Ref, No. HQ/17/JHI/00/00012 – 2022/108. Based on the assessment, CHRA Assessor Ms Hemalatha Tamil Selvan (DOSH Reg. No. HQ/13/ASS/00/316) of Chemviro Enterprise has issued letter dated 10/10/2022 recommending to discontinue exposure monitoring as the exposure to fitters are below permissible limit (PEL).</p> <p>Besides, exposure monitoring the mill management also does medical surveillance for their workers exposed to N-N-Hexane and Maganese on their own initiative even though it is not recommended in the CHRA Report.</p> <p>Sighted latest medical surveillance conducted on 13th April 2024 for 2 Lab Assistants (Mr. Anil Kumar, & Mr. Mohammed Mobinul) and welders (Mr.Muniyasamy Malairajan,& Mr. MD Al Mamun). All the workers examined been certified as "Fit To Work" as per 'Certificate Of Fitness' issued by Dr Lee Teik Leong (DOSH Reg. No. HQ/12/DOC/00279) from Klinik & Surgeri Lee.</p> <p><u>Ulu Basir Estate</u></p> <p>The estate has conducted Chemical Health Risk Assessment (CHRA) has been carried out by Mrs. Hemalatha Tamil Selvan [(HQ13/ASS/00/316-2021/032] on 7th June 2022. The estate management has conducted medical surveillance for sprayer for year 2024. In total there are 7 works stations were assessed as belows :</p> <ol style="list-style-type: none"> 1. Storekeeper 2. Premix 3. Herbicides sprayers (mature & immature) 4. Pesticides sprayers (mature & immature) 5. Fertilizer application workers 6. Rat baiting workers 7. Fitters <p>Sighted latest medical surveillance was carried out on 3rd April 2024 for 24 estate workers for year 2024. The medical examination was carried out by by Dr Lee Teik Leong (DOSH Reg. No. HQ/12/DOC/00279) from Klinik & Surgeri Lee. All the examined workers been certified by doctor stated as fit to work as sighted from individual medical surveillance report. Records of medical surveillance are well maintained by the estate management.</p>	
7.2.11 (C)	<u>Ulu Basir POM</u>	Yes



	<p>There are female 4 workers worked in the mill. All of them are assigned as a gardener in office and executive bungalow which not involve with chemical usage. Based on mill workers list there is no worker below 18 years employed by the mill management.</p> <p><u>Ulu Basir Estate</u></p> <p>There are 8 female workers worked in the estate. All of them are assigned as a gardener in office and executive bungalow which not involve with chemical usage. Based on estate workers list there is no worker below 18 years employed by the estate management. Pesticide spraying are done by estate male workers.</p>																									
7.3.1	<p>The waste management plan for year 2024, prepared by Mr. Mohamad Shafiq bin Naslah, Sr. Asst. Engineer. The action plan has listed type of waste, sources of waste, person in charge, target date and method of disposal, action plan to reduce the produced waste, and supporting document. Example type of waste identified in this document such as POME, laboratory waste, EFB, decanter solid, domestic waste, old tyre, etc. Schedule waste (SW) been adequately identified and disposed as per scheduled waste regulation.</p> <p>For each waste identified, the management has established the action plan with continuous improvement to ensure the waste produced do not contaminate the environment. Action plan sighted such as:</p> <table><tr><th>Type of source</th><th>Source</th><th>Disposal method</th><th>Action plan</th></tr><tr><td>Chemical container</td><td>Mill Processing</td><td>Sold as SW to DOE approved waste contractor/collect or</td><td>Optimum usage of the chemicals to avoid wastage.</td></tr><tr><td>POME</td><td>Mill Processing</td><td>Land and biogas application</td><td>Land application.</td></tr><tr><td>Spent lubricant and hydraulic oil</td><td>Workshop</td><td>Sold as SW to DOE approved waste contractor/collect or</td><td>Regular tractor's maintenance and replace with new tractor if there's a need.</td></tr><tr><td>Laboratory waste</td><td>Testing activity</td><td>Sold as SW to DOE approved waste contractor/collect or</td><td>Optimum usage of the chemicals and/or tools to avoid wastage</td></tr><tr><td>EFB</td><td>FFB</td><td>Mulching in field to retain moisture of soil</td><td>EFB mulching to reduce the usage</td></tr></table>	Type of source	Source	Disposal method	Action plan	Chemical container	Mill Processing	Sold as SW to DOE approved waste contractor/collect or	Optimum usage of the chemicals to avoid wastage.	POME	Mill Processing	Land and biogas application	Land application.	Spent lubricant and hydraulic oil	Workshop	Sold as SW to DOE approved waste contractor/collect or	Regular tractor's maintenance and replace with new tractor if there's a need.	Laboratory waste	Testing activity	Sold as SW to DOE approved waste contractor/collect or	Optimum usage of the chemicals and/or tools to avoid wastage	EFB	FFB	Mulching in field to retain moisture of soil	EFB mulching to reduce the usage	Yes
Type of source	Source	Disposal method	Action plan																							
Chemical container	Mill Processing	Sold as SW to DOE approved waste contractor/collect or	Optimum usage of the chemicals to avoid wastage.																							
POME	Mill Processing	Land and biogas application	Land application.																							
Spent lubricant and hydraulic oil	Workshop	Sold as SW to DOE approved waste contractor/collect or	Regular tractor's maintenance and replace with new tractor if there's a need.																							
Laboratory waste	Testing activity	Sold as SW to DOE approved waste contractor/collect or	Optimum usage of the chemicals and/or tools to avoid wastage																							
EFB	FFB	Mulching in field to retain moisture of soil	EFB mulching to reduce the usage																							



			of inorganic fertilizers	
<p>The estate management has established waste management plan as per document "Types of waste products and method of disposal". The action plan has listed type of waste, source of waste, person in charge, targeted date and method of disposal. Example type of waste identified in this document such as chemical containers, spent lubricant, contaminated PPE, domestic waste and spent batteries.</p> <p>For each waste identified, the management has established the action plan with continuous improvement to ensure the waste produced do not contaminate the environment. Sighted Waste Management Plan year 2024 prepared by Mr. C. Prabhakaran, Assistant Manager Ulu Basir dated 10th May 2024. Action plan sighted for Estate as below :</p>				
Type of source	Source	Disposal method	Action plan	
Fertilizer bags	Manuring Operation	Reused for loose fruit collection	Use of unorganic fertilizing by optimality	
Used polybags	Replanting activities	Sold to waste manager	Nil	
Domestic waste	Worker quarters	All wastes will be sent to composting pit and segregation work to be carried out. Non-bio-degradable and recyclable items are segregated and send to waste manager.	Educate workers to practice reusable containers and bags instead of plastic bags.	
Chemical container	Spraying activity	Sold as SW to DOE approved waste contractor/collect or	Increase area of mowing and IPM	
Spent lubricating and hydraulic oil	Workshop activity	Sold as SW to DOE approved waste contractor/collect or	Regularly tractors maintenance and replace with new tractors if the need to be	



	Used welding rods	Workshop activity		Educate the workers via Reach and Teach and Remind approach to practice to collect the used of welding rods and kept in scheduled waste store for disposal	
7.3.2	<p>Mill's has listed and identified waste product generated in their daily operation. The chemical wastes and other scheduled wastes are disposed through a DOE registered schedule waste disposal contractor (as per mill's 'Waste Product and Sources of Pollution' for year 2024. Sighted samples of disposal records as follow :</p> <ol style="list-style-type: none"> Sample No.1 <ul style="list-style-type: none"> Date of disposal : 23th May 2024 Consignment Note : 2024052318TJ0W27 SW Code : SW 305 Spent Lubricant Oil Quantity : 0.200 MT Disposed by : SP Metro (M) Sdn. Bhd. (DOE License No. 003778 issued on 01/05/2024 and valid until 30/04/2025) Sample No.2 <ul style="list-style-type: none"> Date of disposal : 23th May 2024 Consignment Note : 2024052318CKLWI6 SW Code : SW 409 – Disposed containers, bags or equipment contaminated with chemicals Quantity: 0.2290 MT Disposed by : EDSHA Solution Sdn. Bhd. (DOE License No. 004253 issued on 30th April 2018 and valid until 30th April 2025) <p>The estate have listed and identified waste product generated in their daily operation. The chemical wastes and other scheduled wastes are disposed through a DOE registered schedule waste disposal contractor. The practice of waste disposed as per waste management plan 2024". Sighted record of waste disposal as follow :</p> <ol style="list-style-type: none"> Sample No.1 <ul style="list-style-type: none"> Date of disposal : 15/04/2024 Consignment Note : 2024041514MO651I SW Code : SW 410 – Rags Plastics paper or filters contamination with schedule waste Quantity : 0.200 MT Disposed by : Edsha Solution Sdn Bhd 				Yes



	<p>2. Sample No.2</p> <ul style="list-style-type: none"> • Date of disposal: 15/04/2024 • Consignment Note: 2024041514QOKZJD • SW Code : SW 409 Disposed Container bags or equipment with chemical, pesticides mineral oil or scheduled waste. • Quantity : 0.710 MT • Disposed by : EDSHA Solution Sdn. Bhd. (DOE License No. 004252 issued on 17/08/2017 and valid until 30/04/2025) <p>Domestic waste from mil and estate workers' hosing area is transported to landfill at Changkat Menteri Field 32. The collection is handled by Ulu Basir Estate Management as per stated in the Waste Management and Action Plan 2024.</p>	
7.3.3	<p>The company has established zero burning policy as sighted back in 01/06/1989, signed by Dato Seri B. Bek-Nielsen, Sr. Executive Director. Also sighted in the UPB's Environment and Biodiversity Policy, last updated on 08/03/2021 to comply to Zero Burning policy (1989). Mill has listed and identified waste product generated in their daily operation.</p> <p>The chemical wastes and other scheduled wastes are disposed through a DOE registered schedule waste disposal contractor. The practice of waste disposed as per Waste Management Plan 2024. During site visit to mill and estate sighted no evidence of fire been used for waste disposal.</p>	Yes
7.4.1	<p>The company has established Standard Operating Procedures (SOP) Oil Palm Field Practices includes :</p> <ul style="list-style-type: none"> • Nursery Operations • Replanting • Upkeep Mature/Immature Oil Palm • Drains • Road and Path • Boundaries • Oil Palm Disease Management • Manuring Immature/Mature Oil Palm • Harvesting & Collection • Oil Mill RSPO Supply Chain • Recruitment of Guest Workers • Protection of River Reserves (Riparian & Buffer Zone) • Safe Deposit Lockers for Guest Workers Passports • Internal Audit • Traceability <p>Taking into consideration the fertility status of various soils in UPB, fertilizer trail results and of other related studies and estate yield</p>	Yes



	<p>performance for each field in the various soil series, a yield template has been developed envisaging the magnitude of yield that can be realized for each series under optimum field conditions.</p> <p>Sighted record of training provided to estate workers on GAP based on the SOP. Tissue and soil sampling is done once a year. Annual fertilizer inputs had been monitored through fertilizer recommendations made by Agronomist. Agronomist visit report is evident during the audit as available in United Plantations Berhad, Research Department - Fertilizer Recommendations.</p> <p>Sighted and Leaf Analysis for Ulu Basie Estate which has been carried out by Research Department from 08th February 2023-07th April 2023. The element analysis consists of N,P, K,Mg Ca, B, Cu, Zn, Fe and Mn.</p> <p>Nutrients assessed for soil sampling were pH, Org.C (%), N (%), Total P (ppm), Available P (ppm), and C.E.C (me%) and for foliar sampling were Ash, N, P, K, Ca, B and Mg. Type of soil series established in the estate as follows :</p> <ol style="list-style-type: none"> 1. Gali Series 2. Gondang Series 3. Tepus Series 4. Organic clay muck 5. Batu Lapan Series 6. Bungor Series 7. Serdang Series 										
7.4.2	<p>Tissue and soil sampling is done once a year. Sighted field foliar sample analysis results for year 2023.</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Date Sampling</th><th>Result</th></tr> </thead> <tbody> <tr> <td>Ulu Basir</td><td>08/02/2023 -07/04/2023</td><td>Field No.4 N : 2.39 P : 0.155 K : 0.843 Mg : 0.31 Ca : 0.51 B : 14</td></tr> <tr> <td>Ulu Basir</td><td>04/02/2022 -28/03/2022</td><td>Field No.5 N : 2.58 P : 0.169 K : 1.023 Mg : 0.22 Ca : 0.54 B : 18</td></tr> </tbody> </table>	Estate	Date Sampling	Result	Ulu Basir	08/02/2023 -07/04/2023	Field No.4 N : 2.39 P : 0.155 K : 0.843 Mg : 0.31 Ca : 0.51 B : 14	Ulu Basir	04/02/2022 -28/03/2022	Field No.5 N : 2.58 P : 0.169 K : 1.023 Mg : 0.22 Ca : 0.54 B : 18	Yes
Estate	Date Sampling	Result									
Ulu Basir	08/02/2023 -07/04/2023	Field No.4 N : 2.39 P : 0.155 K : 0.843 Mg : 0.31 Ca : 0.51 B : 14									
Ulu Basir	04/02/2022 -28/03/2022	Field No.5 N : 2.58 P : 0.169 K : 1.023 Mg : 0.22 Ca : 0.54 B : 18									



			Cu :7.5 Zn : 28 Fe : 132 Mn : 183											
7.4.3	EFB, POME and Decanter cake produced by the mill sent to estate for nutrient recycling strategy. POME produce by the mill is used for land application in Ulu Basir Estate. Record POME application maintained by the mill. Sample of record of sighted for year 2024 from "Laporan Bacaan Meter Kadar Alir" for Ulu Basir Estate land application include as follow : <table><tr><td>Month (2024)</td><td>POME (M³)</td></tr><tr><td>January</td><td>9,739</td></tr><tr><td>February</td><td>6,386</td></tr><tr><td>March</td><td>2,758</td></tr><tr><td>April</td><td>6,792</td></tr></table> Sighted record for application of EFB at the estate. Empty Fruit Bunches (EFB) to replace potassium, moisture retention and as supplement from inorganic fertilizer. The recommendation per ha is 30 MT. EFB application has been applied to field.			Month (2024)	POME (M³)	January	9,739	February	6,386	March	2,758	April	6,792	Yes
Month (2024)	POME (M³)													
January	9,739													
February	6,386													
March	2,758													
April	6,792													
7.4.4	Annual fertilizer inputs had been monitored through fertilizer recommendations made by Agronomist. Agronomist visit report is evident during the audit as available in United Plantations Berhad, Research Department -Fertilizer Recommendations. Record of fertilizer input period of April 2023 at Division 1 sighted as follow : <ul style="list-style-type: none">Field No.2 with total of areas 72 Ha : type of fertilizer is urea, dossage is 1.00 Kg and status is done.Field No.41 with total of areas 57.9 Ha : type of fertilizer is MoP, dossage is 1.20 Kg and status is done.			Yes										
7.5.1 (C)	Ulu Basir Mill is located within the Ulu Basir estate so that soil map was covered estate and mill and it is available during the audit. Soil series as per identified in the map such as : <ul style="list-style-type: none">Gali series (Shallow peat <3')Gondang series (Peat 3-6')Gondang series (Peat 6-9')Gondang series (Peat >9')Tepus/Gali seriesOrganic Clay MuckBatu Lapan / Bungor series			Yes										
7.5.2	There is no steep terrain in the estate. Based on the survey area, the area was classified as flat terrain & predominantly with a slope			Yes										



	class of < 6° (80.30%) and rolling (19.70%). Reference to Topo Map Ulu Basir Estate UPB, Sheet 3659 Behrang, 7030 Series, scale 1:50,000.																																																				
7.5.3	There is no new planting in the estate thus far	Yes																																																			
7.6.1 (C)	There is no new planting in the estate as of this audit period.	Yes																																																			
7.6.2	<p>Peat subsidence is monitored on quarterly and summarize in yearly basis. There are 2 probes located at field no. 18 & 32. Sighted "Peat Subsidence Probe Quarterly Reading" prepared by Senior Research Manager Dr. Vijiandran J Rajah. Reading recorded as follow :</p> <table border="1"> <thead> <tr> <th>Year</th><th>Subsidence since last reading (cm)</th><th>Rate of peat subsidence per year (cm/year)</th></tr> </thead> <tbody> <tr> <td>13.03.2009</td><td>0</td><td>0</td></tr> <tr> <td>15.05.2009</td><td colspan="2">Re installed</td></tr> <tr> <td>22.07.2010</td><td>3.70</td><td>3.12</td></tr> <tr> <td>22.07.2011</td><td colspan="2">Peat probe disturbed /pressed in</td></tr> <tr> <td>25.08.2011</td><td>0</td><td>0</td></tr> <tr> <td>26.10.2012</td><td>1.50</td><td>1.28</td></tr> <tr> <td>27.08.2013</td><td>1.38</td><td>1.32</td></tr> <tr> <td>31.12.2014</td><td>0.27</td><td>0.89</td></tr> <tr> <td>31.12.2015</td><td>0.45</td><td>0.89</td></tr> <tr> <td>30.12.2016</td><td>1.34</td><td>0.90</td></tr> <tr> <td>30.12.2017</td><td>0.70</td><td>0.70</td></tr> <tr> <td>28.12.2018</td><td>2.61</td><td>2.62</td></tr> <tr> <td>30.12.2019</td><td>0.85</td><td>1.07</td></tr> <tr> <td>31.12.2020</td><td>0.80</td><td>1.04</td></tr> <tr> <td>31.12.2021</td><td>3.50</td><td>1.04</td></tr> <tr> <td>31.12.2022</td><td>2.00</td><td>1.34</td></tr> </tbody> </table> <p>Estate management has complied with the requirement of RSPO about the monitoring of subsidence at peat areas. During the site visit to the peat areas, the auditor found the subsidence pole was well maintained and the reading of subsidence is updated yearly.</p>	Year	Subsidence since last reading (cm)	Rate of peat subsidence per year (cm/year)	13.03.2009	0	0	15.05.2009	Re installed		22.07.2010	3.70	3.12	22.07.2011	Peat probe disturbed /pressed in		25.08.2011	0	0	26.10.2012	1.50	1.28	27.08.2013	1.38	1.32	31.12.2014	0.27	0.89	31.12.2015	0.45	0.89	30.12.2016	1.34	0.90	30.12.2017	0.70	0.70	28.12.2018	2.61	2.62	30.12.2019	0.85	1.07	31.12.2020	0.80	1.04	31.12.2021	3.50	1.04	31.12.2022	2.00	1.34	Yes
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7.6.3	There is no new planting for the estate. For oil palm planted on existing peat areas, drainage requirements are defined in 4.4.4 sub-section, 1.4.4 Peat Cultivation / Management SOP 4.4 dated 31/03/2014.	Yes																																																			
7.7.1 (C)	There is no new planting on estate's peat soil as the entire peat soil of 613.70 Ha already been planted with oil palm. The peat soil was planted with oil palm since 1980s.	Yes																																																			
7.7.2	Existing palms at peat area were planted for a total area of 613.70 Ha. Based on the survey area, the area was classified as flat terrain & predominantly with a slope class of < 6° (80.30%) and rolling (19.70%). Sighted the peat mapping inventory map namely Soil	Yes																																																			



	<p>Map of Ladang Ulu Basir. Peat depth varies from moderately deep to deep (sapric condition).</p> <p>Sighted email submission from Sustainability Manager dated 15th February 2022. The purpose of the email is to notify the RSPO Unit about the Peat inventory for the entire United Plantations Berhad. The record of peat soil was found in the following estates :</p> <table border="1"> <thead> <tr> <th>No</th><th>Estate</th><th>OP Planting of Peat</th></tr> </thead> <tbody> <tr> <td>1</td><td>UIE Estate</td><td>1,206.80</td></tr> <tr> <td>2</td><td>Jendarata Estate*)</td><td>576.19</td></tr> <tr> <td>3</td><td>Ulu Basir Estate</td><td>613.70</td></tr> <tr> <td>4</td><td>Sungei Erong Estate</td><td>310.30</td></tr> <tr> <td>5</td><td>Sungei Chawang Estate</td><td>325.80</td></tr> <tr> <td>6</td><td>Lada Estate</td><td>326.00</td></tr> <tr> <td>7</td><td>Runtu Estate</td><td>430.00</td></tr> <tr> <td>8</td><td>Plasma Arut</td><td>28.00</td></tr> <tr> <td>9</td><td>Tanarata Estate (Newly acquired in August 2019)</td><td>1,097.14</td></tr> <tr> <td></td><td>Total (Ha)</td><td>4,913.93</td></tr> </tbody> </table> <p>Remarks : *). During ASA-3, total of planted areas at peat soil in Jendarata Estate is 1,073.50 Ha. Based on recent assessment by the R&D, the peat under Jendarata Estate has reduced to 576.19 Ha.</p>	No	Estate	OP Planting of Peat	1	UIE Estate	1,206.80	2	Jendarata Estate*)	576.19	3	Ulu Basir Estate	613.70	4	Sungei Erong Estate	310.30	5	Sungei Chawang Estate	325.80	6	Lada Estate	326.00	7	Runtu Estate	430.00	8	Plasma Arut	28.00	9	Tanarata Estate (Newly acquired in August 2019)	1,097.14		Total (Ha)	4,913.93				
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7.7.4 (C)	<p>Estate management was installed the piezometer at the collection drain and the monitoring of the water level is made on weekly and summarize on monthly basis. There are 5 location of piezometer established in the estate located at block F20, F22, F23, F32 and F35. Sighted the record of water table monitoring for the year 2022 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 on 31/03/2014, the water table level to be maintained between 0.4 meter to 0.60 meter.</p> <p>For easy monitoring of water level, estate has established a water flow map. The map has been updated and maintained by estate management. Each and every sampling point are clearly marked as well as water flow direction.</p> <p>Piezometer No : 1 Field No : F 20 (R50 P7) Length of piezometer : 194 cm Piezometer to soil base : 53 cm Date installed : 13th October 2020</p> <table> <tr> <th>Date</th><th>Water reading</th><th>Water table heigh</th></tr> <tr> <td>02.01.2022</td><td>85</td><td>32</td></tr> <tr> <td>09.01.2022</td><td>90</td><td>37</td></tr> <tr> <td>16.01.2022</td><td>93</td><td>40</td></tr> <tr> <td>23.01.2022</td><td>106</td><td>53</td></tr> <tr> <td>31.01.2022</td><td>117</td><td>64</td></tr> <tr> <td>Total</td><td>98</td><td>45</td></tr> </table> <p>During site visit at the peat area, sighted the implementation of Field, Collection and Main drain in the constructed in the field.</p>	Date	Water reading	Water table heigh	02.01.2022	85	32	09.01.2022	90	37	16.01.2022	93	40	23.01.2022	106	53	31.01.2022	117	64	Total	98	45	Yes
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7.7.5 (C)	There is no drainability assessment been conducted due to there is no replanting program in the coming 5 years for this estate.	Yes								
7.7.6 (C)	<p>Water management plan for peat area has been established by United Plantations Berhad as below :</p> <ul style="list-style-type: none"> • Area of management. : Peat soil (if any) • Measures : Please refer to our Standard Operating Procedure on cultivation of peat areas. <p>During site visit at the peat area, sighted the implementation of Field, Collection and Main drain in the constructed in the field.</p>	Yes								
7.7.7 (C)	It's confirmed during site visit to Ulu Basir Estate, no unplanted area found in the estate.	Yes								
7.8.1	<p>Mill and estate management has established water management plan SOP No. 4, 'Water Management Plan' dated 10/02/2007 identifying field water management. There is additional water management plan which identified water management requirement for peat soil, water for consumption.</p> <p>Estate has established the water manager plan as part of RSPO requirement. The management plan is a below :</p> <table> <tr> <th>Area</th> <th>Measures</th> </tr> <tr> <td>Peat soil (if any)</td> <td>i. Please refer to our Standard Operating Procedure on cultivation of peat areas.</td> </tr> <tr> <td>Water for consumption</td> <td> 1. To ensure the water pump house / water drawing facility is maintained 2. To ensure the pipes / tanks / valves are not faulty / leaking and that they are repaired / replacement immediately if detected 3. To ensure that correct dosage of water chemicals are added. 4. To perform periodic monitoring of the untreated and treated water. The treated water shall be subjected to microbial test before being allowed for human consumption. 5. To monitor the water usage of linesite on monthly basis. </td> </tr> <tr> <td>Domestic wastewater / Palm Oil Mill Effluent</td> <td>To ensure wastewater / effluent drains, pipes and effluent ponds bund are in good condition through periodic checks</td> </tr> </table> <p>Source of water for mill processes is extracted from Bernam river to mill raw water pond and later processed through mill's water treatment plant. Treated water are pumped to overhead storage tank. For mill usage, water from Concrete Holding Tank flow to mill</p>	Area	Measures	Peat soil (if any)	i. Please refer to our Standard Operating Procedure on cultivation of peat areas.	Water for consumption	1. To ensure the water pump house / water drawing facility is maintained 2. To ensure the pipes / tanks / valves are not faulty / leaking and that they are repaired / replacement immediately if detected 3. To ensure that correct dosage of water chemicals are added. 4. To perform periodic monitoring of the untreated and treated water. The treated water shall be subjected to microbial test before being allowed for human consumption. 5. To monitor the water usage of linesite on monthly basis.	Domestic wastewater / Palm Oil Mill Effluent	To ensure wastewater / effluent drains, pipes and effluent ponds bund are in good condition through periodic checks	Yes
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	<p>directly while for workers line site is treated with chlorine prior supply to labour line site.</p> <p>Supply of water for workers domestic use is solely from mill treated water. The management has done water analysis for treated water for consumption on monthly basis to ensure its quality is meeting with the MOH requirement. Sampled record of water analysis done from January to May 2024 which are found to be in compliance with MOH Guideline for water quality.</p> <p>Below are the last 3 months records of water quality tested by independent SM Accredited Laboratory, ChemVi Laboratory Sdn Bhd.</p> <table><tr><th>Test Parameter</th><th>March 2024</th><th>April 2024</th><th>May 2024</th><th>MOH Req.</th></tr><tr><td>Date sampled</td><td>05/03/2024</td><td>07/5/2024</td><td>17/5/24</td><td>-</td></tr><tr><td>Turbidity</td><td>0.40</td><td>0.40</td><td>0.40</td><td>5</td></tr><tr><td>pH</td><td>6.46</td><td>6.84</td><td>6.65</td><td>6.5-9.0</td></tr><tr><td>Total Dissolved Solid (mg/L)</td><td>6.1</td><td>22</td><td>20</td><td>1000</td></tr><tr><td>Ammonia (mg/L)</td><td>0.12</td><td>0.16</td><td>0.13</td><td>1.5</td></tr><tr><td>Nitrate (mg/L)</td><td>0.60</td><td>2.20</td><td>0.10</td><td>10</td></tr><tr><td>Iron (mg/L)</td><td>0.03</td><td>ND</td><td>ND</td><td>0.3</td></tr><tr><td>Aluminum (mg/L)</td><td>0.05</td><td>0.08</td><td>0.06</td><td>0.2</td></tr><tr><td>E-Coli (CFU/100L)</td><td>ND</td><td>ND</td><td>ND</td><td>-</td></tr><tr><td>Total E-Coli (CFU/100L)</td><td>ND</td><td>ND</td><td>ND</td><td>-</td></tr><tr><td>Free Chlorine</td><td>0.22</td><td>0.20</td><td>0.21</td><td>0.2 - 0.3</td></tr></table> <p>The estate water supply is from mill processed river water. Drinking water quality are monitored by the mill management. Thus, the management maintain the similar water quality analysis.</p>	Test Parameter	March 2024	April 2024	May 2024	MOH Req.	Date sampled	05/03/2024	07/5/2024	17/5/24	-	Turbidity	0.40	0.40	0.40	5	pH	6.46	6.84	6.65	6.5-9.0	Total Dissolved Solid (mg/L)	6.1	22	20	1000	Ammonia (mg/L)	0.12	0.16	0.13	1.5	Nitrate (mg/L)	0.60	2.20	0.10	10	Iron (mg/L)	0.03	ND	ND	0.3	Aluminum (mg/L)	0.05	0.08	0.06	0.2	E-Coli (CFU/100L)	ND	ND	ND	-	Total E-Coli (CFU/100L)	ND	ND	ND	-	Free Chlorine	0.22	0.20	0.21	0.2 - 0.3	
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7.8.2 (C)	<p><u>UIU Basir POM</u></p> <p>Not applicable as the water analysis for river is conducted by the estate management</p> <p><u>Ulu Basir Estate</u></p> <p>Management has identified 8 sampling points for water sampling which is monitored annually. All samples are sent to lab managed by UPRD Lab. The location identified sighted in "Ulu Basir Water Sampling Map" dated 24/5/2024.</p> <ol style="list-style-type: none">1. LOC 37: HDT Gate Outlet (outgoing)2. LOC 32: Drain linked to Suez drain (outgoing)3. LOC 8: Inside twin gate (outgoing)	Yes																																																												



	<p>4. LOC 28: Bridge over road Sg. Dharoi inlet (Arriving) 5. LOC 29: Road bridge Sg. Dharoi (Midway) 6. LOC 7: Metal bridge Sg. Bernam (Arriving) 7. LOC 30: HDT Gate Sg. Bernam (Midway) 8. LOC 31: Middle of river outside twin gate (Departure).</p> <p>Sighted memo dated 10/06/2023 from Director Research, UP Bhd, titled "Water Analysis Data 2023". Latest sampling for all the points was done on 26/8/2023 & 1/9/2023. Sample parameters tested by the lab as per below:</p> <table border="1"> <thead> <tr> <th>Parameter</th><th>LOC 8</th><th>LOC 28</th></tr> </thead> <tbody> <tr> <td>pH</td><td>6.5</td><td>6.4</td></tr> <tr> <td>BOD mg/L</td><td>7</td><td>7</td></tr> <tr> <td>COD mg/L</td><td>31</td><td>33</td></tr> <tr> <td>SS mg/L</td><td>8</td><td>10</td></tr> <tr> <td>O&G mg/L</td><td><1</td><td><1</td></tr> <tr> <td>Diss. O₂</td><td>5.7</td><td>5.9</td></tr> <tr> <td>Ammoniacal Nitrogen</td><td><0.05</td><td><0.05</td></tr> <tr> <td>E. Coli</td><td><1</td><td><1</td></tr> <tr> <td>WQI</td><td>64.68</td><td>64.60</td></tr> <tr> <td>Water Quality class</td><td>III</td><td>III</td></tr> </tbody> </table> <p>Verified from the map entitled River, River Reserves & Wetlands of Ladang Ulu Basir, there is no river runs through the estate. River identified to runs along the estate boundary.</p> <p>A total area of 129.48 hectares of conservation area (Riparian) has been identified by the management which consists of wetland sanctuary and river reserve (Sungai Bernam). Signboards of buffer zone has been displayed to prevent any estate activities in this area.</p>	Parameter	LOC 8	LOC 28	pH	6.5	6.4	BOD mg/L	7	7	COD mg/L	31	33	SS mg/L	8	10	O&G mg/L	<1	<1	Diss. O ₂	5.7	5.9	Ammoniacal Nitrogen	<0.05	<0.05	E. Coli	<1	<1	WQI	64.68	64.60	Water Quality class	III	III	
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7.8.3	<p>POME produced by the mill is channeled to methane capture facility in the mill. The methane gas produced is then used as fuel to feed the mill boiler during high crop season, while in low crop season the methane will then be used to flare for biogas plant.</p> <p>Final discharge from the mill is sent for land irrigation / Flat bed in Ulu Basir Estate. Final discharge of mills effluent BOD level is monitored on monthly basis. Sighted last 3 months record from Independent Testing Laboratory, ChemVi Laboratory Sdn Bhd as follow:</p> <ul style="list-style-type: none"> • Sampled on 07/05/2024 – BOD 49 mg/L • Sampled on 02/04/2024 – BOD 33 mg/L • Sampled on 05/03/2024 – BOD 82 mg/L 	Yes																																	



	The BOD level of final discharge to land application is within the limit of DOE for final discharge of not exceeding 5,000 mg/L.																																					
7.8.4	<p>The mill monitors water usage per tonne of FFB for its operation as sighted from document “Mill Water Consumption in Processing FFB Monthly Data for 2024”. Example of data sighted include</p> <table><tr><th>Month</th><th>Water usage (m³)</th><th>FFB Processed (MT)</th><th>Water / Mt FFB (m³/Mt)</th></tr><tr><td>January</td><td>629</td><td>5,842.11</td><td>0.1077</td></tr><tr><td>February</td><td>590</td><td>1,463.83</td><td>0.4031</td></tr><tr><td>March</td><td>592</td><td>1,445.73</td><td>0.4095</td></tr><tr><td>April</td><td>613</td><td>2,805.17</td><td>0.2185</td></tr><tr><td>May</td><td>606</td><td>4,010.10</td><td>0.1511</td></tr></table>	Month	Water usage (m³)	FFB Processed (MT)	Water / Mt FFB (m³/Mt)	January	629	5,842.11	0.1077	February	590	1,463.83	0.4031	March	592	1,445.73	0.4095	April	613	2,805.17	0.2185	May	606	4,010.10	0.1511	Yes												
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7.9.1	<p><u>Ulu Basir POM</u></p> <p>The mill management monitors fossil fuel used for the mill operation as sighted from fuel usage record for year 2024. Details as below:</p> <table><tr><th>Month</th><th>Diesel (L)</th><th>Petrol (L)</th><th>Lubricant (L)</th></tr><tr><td>January</td><td>1,575</td><td>212</td><td>782</td></tr><tr><td>February</td><td>1,150</td><td>208</td><td>126</td></tr><tr><td>March</td><td>935</td><td>218</td><td>261</td></tr><tr><td>April</td><td>1,406</td><td>183</td><td>60</td></tr><tr><td>May</td><td>1,055</td><td>200</td><td>374</td></tr></table> <p><u>Ulu Basir Estate</u></p> <p>Monitoring of fossil fuel used by the estate is available during the audit. The mill is recoding its usage for petrol, lubricants and diesel. Estate action plan to optimize the fossil fuel usage by:</p> <ol style="list-style-type: none">1. plant more beneficial plant for bagworm biological control – less usage of trunk injection which uses petrol2. educate and train the cutter to use mechanized cutter (harvesting) efficiently.3. provide continuous training on driving awareness and efficient usage of vehicles. <p>Example monitoring data for fossil fuel for year 2024 by Ulu Basir Estate as following;</p> <table><tr><th>Month</th><th>Diesel (L)</th><th>Petrol (L)</th><th>Lubricant (L)</th></tr><tr><td>January</td><td>17,599</td><td>941</td><td>286</td></tr><tr><td>February</td><td>12,458</td><td>950</td><td>409</td></tr></table>	Month	Diesel (L)	Petrol (L)	Lubricant (L)	January	1,575	212	782	February	1,150	208	126	March	935	218	261	April	1,406	183	60	May	1,055	200	374	Month	Diesel (L)	Petrol (L)	Lubricant (L)	January	17,599	941	286	February	12,458	950	409	Yes
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March	15,340	1,124	149											
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May	14,001	1,024	192											
7.10.1 (C)	<p>The GHG emissions have been identified as per reported in “Life Cycle Assessment of Palm Oil at United Plantations Berhad 2024” produced by Jannick Schmidt, Lara Serena and Jonas Eliassen.</p> <p>The management is frequently monitoring the usage of diesel, petrol, lubricants as per record sighted during the audit assessment.</p> <p>The mill is monitoring its GHG emission through RSPO palm GHG Calculation sighted for period Jan-Dec 2023, GHG emission value for mill stated as follow:</p> <ul style="list-style-type: none">• CPO emission: 1.54 tCO2e/tProduct• PK emission: 1.54 tCO2e/tProduct <p>Palm GHG input data been verified in the RSPO palm GHG Calculator form the RSPO Website.</p> <p>Reductions in GHG emissions levels are seen when new technology have been installed replacing older less clean technologies; this mainly relates to the installation of biogas plants and avoiding methane emissions from anaerobic digestion in POME treatment.</p>	Yes												
7.10.2 (C)	There is no new planting for the estate since 2014.	Yes												
7.10.3 (C)	<p><u>Ulu Basir POM</u></p> <p>Mill’s polluting activities has been assessed during Social and Environmental Impact Assessment (SEIA) as sighted from Sighted Environmental Management Plan (EMP), mitigation measures are identified for in the Environment Impacts Assessment register to prevent or minimize pollution.</p> <p>For example: Mill’s POME to be treated through ponding system and final discharge to land estate as land application as a nutrient recycling strategy. Hazardous wastes are disposed as scheduled wastes as identified in the Mill’s Waste management Plan.</p> <p>Other mill significant pollutants include emission from boiler operation. The mill management does annual stack monitoring for the boiler emission as sighted from latest mentoring report titled “Isokinetic and Air Emission Monitoring & Dark Smoke Observation Report”, Report Ref. No. MURNI/0124/6259. The stack monitoring was done on 07/02/2024 by CSK Murni Services Sdn Bhd. The monitoring report concluded that ‘Isokinetic Stack and Air Emission Monitoring was found to be well within the Environmental Quality (Clean Air) Regulations 2014’ during the sampling period.</p>	Yes												



	<p>While for smoke opacity monitored, found to be well within the limit of dark smoke observation (darker than Ringelmann Chart shade No.1).</p> <p>Ulu Basir Estate Similar to Ulu Basir POM, Estate's polluting activities has been assessed during Social and Environmental Impact Assessment (SEIA).</p> <p>Environmental Management Plan consist the followings estate operations;</p> <ul style="list-style-type: none"> • Nursery Operations. • Replanting. • Upkeep Mature/Immature Oil Palm. • Oil Palm Disease Management. • Manuring Immature/Mature Oil Palm. • Protection of River Reserves (Riparian & Buffer Zone). <p>Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	
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 08/03/2021 to compliance to Zero Burning policy (1989). The estate has done oil palm replanting in year 2018. The estate has replanting procedure SOP no.2 which prohibits use of ire for clearing old palm trees. The land preparation is by pre-lining for felling and chipping of old palm trunk.</p> <p>There is no new planting or replanting for the estate as of this audit period. Last replanting was done in year 2017.</p>	Yes
7.11.2	<p>The estate has established emergency response flowchart in case of fire. The flow chart has been displayed on estate office notice board, as well as emergency contact numbers.</p> <p>Emergency response team headed by Estate Manager. Beside fire extinguishers located at strategic location of the estate, the estate has a mobile BOMBA unit equipment with water tank, fire extinguisher, 100-meter water hose complete with nozzle, water pump, and other firefighting equipment that can be towed by tractor to remote area of the estate to put out fire.</p> <p>Training of fire drill also has been given to the employees on 29/05/2024 to increase the awareness of the hazard and train them to properly react to any fire incident.</p>	Yes



7.11.3	<p>Annual dialogue session was conducted on 25/04/2024 with surrounding stakeholder which includes fire prevention. The meeting was conducted at Community Hall Division 1 Ulu Bernam Estate. Sighted the attendance list, meeting agenda and presentation material kept in the file for reference.</p> <p>One of meeting discussion is about fire prevention and the action taken if there is sign of fire outbreak in the estate and surrounding and the contact number to refer if fire happen.</p>	Yes
7.12.1 (C)	There is no new planting since 2005 for the estate. The estate was planted with oil palm since 1985.	Yes
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 14/01/2008. The assessment has covered 6 estates including Ulu Basir Estate. The report has not identified presence of any HCV.</p> <p>The assessment report has recommended following:</p> <ol style="list-style-type: none"> 1. All the riverine reserve a designated as wetland sanctuary. All areas should be marked on the ground, as well as, a map. 2. Sign board to be erected strategically. 3. Control assesses by outsider. 4. Develop a project to enhance the riparian forest through forest rehabilitation. <p>The estate has conducted own HCV assessment on 13/5/2024 where it has self-declared conservation area in a total area of 129.48 Ha. The area identified is located in a wetland area (unplantable) and along river (Sungai Bernam) which flows along the estate boundary.</p> <p>The estate has installed signboards in the area (Buffer zone, No hunting, No fishing) to prevent any estate activities to be conducted at all time.</p>	Yes
7.12.3 (C)	There is no new planting since 2005 for the estate	Yes
7.12.4 (C)	There is no new planting since 2005 for the estate	Yes
7.12.5	There is no new planting since 2005 for the estate	Yes
7.12.6	There is no new planting since 2005 for the estate. The estate was planted with oil palm since 1927.	Yes
7.12.7	<p>'Conservation Assessment of United Plantation's Perak Estates' conducted on Complex Basis by Wilds Asia's Sdn Bhd dated 14/01/2008 has not identified presence of any RTE species.</p> <p>In addition, Ulu Basir estate has conducted in-house assessment HCV/Conservation Area on 14/08/2020. There is no HCV or RTE species identified in the self-assessment. As concluded, for Ulu Basir</p>	Yes



	<p>Estate, the riparian zone along the boundary has been classified as self-declared conservation area.</p> <p>In addition, the estate has conducted HCV awareness training for its workers as sighted from record of training conducted on 10/04/2024 by Field Staff Mr. Suhaizam Islah attended by 16 estate workers.</p> <p>The estate management also monitors for any sighting of wild life present within the plantation as sighted from record of sighting retained in "Wildlife Sighting Book". Latest sighting of Otters was done on 4/6/2024 at field no. 50.</p>	
7.12.8 (C)	There is no new planting since 2005 for the estate. The estate was planted with oil palm since 1927.	Yes



5.0 Details of Nonconformities and Area of Concern identified during this assessment

5.1 Major Nonconformities: Nil

5.2 Minor Nonconformities: Nil

5.3 Opportunity for Improvement: Nil

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 previous NC raised.

5.5 Noteworthy positive Components

1.	Good co-operation between Auditor & Auditee. Two-way communication and punctuality on audit program
2.	Good feedback and comments received from internal & external stakeholder
3.	Ulu Basir mill as back-up for Optimill – is well kept and ever ready for operation as a primary mill



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	1.54
PK	1.54

Production	t/yr
FFB processed	83,490.70
CPO Produced	17,894.00
PK Produced	3,603.00

Extraction	%
OER	21.43
KER	4.32

Land use	Ha
OP planted area	17,393.81
OP planted on peat	1,250.06
Total	18,643.87
Conservation (forested)	240.00
Conservation (non forested)	0.00
Total	18,883.87

Summary of Field Emissions and Sinks

	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	tCO ₂ e
Emissions							
Land Conversion	30,465.17	0.36	0.00	0.00	0.00	0.00	30,465.17
*CO ₂ Emissions from Fertiliser	4,206.15	0.05	0.00	0.00	0.00	0.00	4,206.15
**N ₂ O Emissions	6,512.98	0.08	0.00	0.00	0.00	0.00	6,512.98
Fuel Consumption	603.59	0.01	0.00	0.00	0.00	0.00	603.59
Peat Oxidation	19,579.24	0.23	0.00	0.00	0.00	0.00	19,579.24
Sinks							



	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	tCO ₂ e
<i>Crop Sequestration</i>	-28,879.16	-0.35	0.00	0.00	0.00	0.00	-28,879.16
<i>Conservation Sequestration</i>	-808.71	-0.01	0.00	0.00	0.00	0.00	-808.71
Total	31,679.25	0.38	0.00	0.00	0.00	0.00	31,679.25

Summary of Mill Emissions and Credits

Emissions	tCO₂e	tCO₂e/tFFB
<i>POME</i>	1,739.13	0.02
<i>Fuel Consumption</i>	81.43	0.00
<i>Grid Electricity Utilisation</i>	0.00	0.00
Credits		
<i>Export of Grid Electricity</i>	-399.23	0.00
<i>Sales of PKS</i>	0.00	0.00
<i>Sales of EFB</i>	0.00	0.00
Total	1,421.34	0.02

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0.00
Divert to anaerobic digestion (%)	100.00

POME Diverted to Anaerobic Digestion

Divert to anaerobic pond (%)	0.00
Divert to methane capture (flaring) (%)	100.00
Divert to methane capture (electricity generation) (%)	0.00



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
United Plantations Berhad



.....
 Lee Kian Wei – Sustainability Manager
 Date : 10 July 2024

Signed for on behalf of
Global Gateway Certifications Sdn. Bhd



.....
 Name : Hendra Fachrurazy
 Role : GGC Lead Auditor (witnessed)
 Date : 10 July 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:	Muhd Jamalul Arif
Position:	Certifier
Date:	11/07/2024



.....
Signature



Annex 1 – Audit Agenda

AGENDA				
Date	Location	Subjects	Lead Auditor	Auditor
10/06/2024 (Monday)		Travelling day	HF	OAS, IBI, SMS
11/06/2024 (Tuesday)	Ulu Basir office	08.30 – 09.00: Opening meeting <ul style="list-style-type: none"> Introduction by team leader 	HF	OAS, IBI, SMS
	Ulu Basir POM	09.00 – 17.00 : Document review <ul style="list-style-type: none"> Ethical conduct & transparency (P.1) Supply FFB from external UoC is legal (C2.3) Supply Chain Certification Assessment of the POM (RSPO SCC) (C3.8) Respect community & human rights and delivery benefits (P.4) Partial certification & Time Bound Plan Last year NC (s) verification (NOT APPLICABLE) Comply to law & regulation by UoC & their contractors (including FFB suppliers) (C2.1 & C2.2) Respect worker rights and conditions (P.6) Management plan (C3.1) CIP & Matrix template (C3.2) Operating procedure (C3.3) EIA & SIA (C3.4) HR system (C3.5) OHS Plan (C3.6) Training (C3.7) Waste (C7.3) Surface and groundwater (C7.8) Fossil fuel (C7.9) GHG (C7.10) Fire (C7.11) HCV & LUCA (C7.12) 	HF	IBI SMS OAS
		Site verification & Interview <ul style="list-style-type: none"> Mill inspection to weighbridge office, store/warehouse (part, chemical, etc), loading ramp/receiving FFB from lorry, waste store Workers interview 	HF	SMS



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AGENDA				
Date	Location	Subjects	Lead Auditor	Auditor
		<ul style="list-style-type: none"> GHG (C7.10) Fire (C7.11) HCV & LUCA (C7.12) <p>Site verification</p> <ul style="list-style-type: none"> Stakeholder consultation by phone to estate manager in Kiara Jubli estate, contractor for CPO transportation in PO Harvesting areas & Pruning areas Mosque, Temple & School Boundary pillar, pesticide store & chemical store, changin room / shower room, EFB application Composting pit, Clinic Interview with worker Waste store Interview withh worker 	HF	<p>SMS & IBI</p> <p>OAS</p>



AGENDA				
Date	Location	Subjects	Lead Auditor	Auditor
13/06/2024 (Thursday)	United Plantations Office – Meeting Room	<p>09.00 – 12.00 : Document review (continue)</p> <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 (NOT APPLICABLE) <p>13.00 – 13.30 : Preparation for closing meeting Additional field visits and meetings with managers as necessary.</p> <p>14.00 : 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>	HF	OAS, IBI, SMS



Annex 2 – Maps





United Plantations Berhad Ulu Basir Estate

