

**MALAYSIAN SUSTAINABLE PALM OIL
SURVEILLANCE ASSESSMENT - ASA1
Public Summary Report**

United Plantations Berhad
Client company Address: Jendarata Estate 36009 Teluk Intan Perak, Malaysia
Certification Unit: United International Enterprise Palm Oil Mill (U.I.E Palm Oil Mill) Location of Certification Unit: Mail Bag No. 1 34900 Pantai Remis, Perak Darul Ridzuan Malaysia

Report prepared by:
Muhammad Fadzli Masran (Lead Auditor)

Report Number: 9674302

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
www.bsigroup.com

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	UIE POM : 500124504000 UIE Estate: 502076202000		
Company Name	United Plantations Berhad		
Address	Jendarata Estate, 36009 Teluk Intan, Perak.		
Group name if applicable:	Nil		
Subsidiary of (if applicable)	Nil		
Contact Person Name	C. Mathews		
Website	http://www.unitedplantations.com	E-mail	mathewsc6@gmail.com
Telephone	05-6436271	Facsimile	05-6417100

1.2 Certification Information			
Certificate Number	Mill: MSPO 693205 Estate: MSPO 693206		
Issue Date	28/09/2018	Expiry date	27/09/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	20 & 21/06/2018		
Continuous Assessment Visit Date (CAV) 1	11 – 13/6/2019		
Continuous Assessment Visit Date (CAV) 2	NA		
Continuous Assessment Visit Date (CAV) 3	NA		
Continuous Assessment Visit Date (CAV) 4	NA		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO (RSPO 693198)	RSPO P&C MYNI 2014 and Supply Chain 2017	BSI Services Malaysia Sdn. Bhd.	28/09/2022
RSPO NEXT (RSPO 665456)	RSPO NEXT Guidance	BSI Services Malaysia Sdn. Bhd.	28/09/2022

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
UIE POM	34900 Pantai Remis, Perak	100° 43' 11" E	4° 26' 53" N
UIE Estate	34900 Pantai Remis, Perak	100° 43 '22" E	4° 26' 38" N

1.4 Plantings & Cycle					
Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
UIE Estate	1038.47	7605.67	313.61	-	-

1.5 FFB Production (Actual) and Projected (tonnage)			
Producer Group	Projected from last audit (June 18-May 19)	Actual production last 12 months (June 18- May 19)	Projected production for next 12 months (June 2019 – May 2020)
UIE Estate	226,070.00	236,958.04	219,000

1.6 Certified CPO / PK Tonnage			
Mill	Estimated (June 18-May 19)	Actual (June 18-May 19)	Forecast (Next Year) June 2019 – May 2020
UIE POM 60 MT/hr	CPO (OER: 21.49 %)	CPO (OER: 21.24 %)	CPO (OER: 20.80 %)
	48,582.44	50,320.54	45,552.00
	PK (KER: 4.30 %)	PK (KER: 3.86 %)	PK (KER: 4.65 %)
	9721.01	9,141.45	10183.50

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
UIE Estate	8957.75	10.53	1400.92	10369.20	86.39
TOTAL	8957.75	10.53	1400.92	10369.20	86.39

- Different in Total Planted hectare at 146.56 hectare was due to the area was replanted with coconut instead of oil palm. The 146.56 hectare was included in Infrastructure & Other hectare. No changes in the land title and total hectareage.

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment 1 of United Plantation Berhad-UIE POM, located in Pantai Remis, Perak comprising 1 Mill and 1 Estate and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills.

The onsite assessment was conducted on 11 and 12/6/2019

Based on the assessment result, United Plantation Berhad-UIE POM complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 11 and 12/6/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the UIE Palm Oil Mill and its supply base, UIE Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. The MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

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

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

1. Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
UIE POM	√	√	√	√	√
UIE Estate	√	√	√	√	√

Tentative Date of Next Visit: June 10, 2020 - June 11, 2020

Total No. of Mandays: 4 mandays

BSI Assessment Team:

Muhammad Fadzli Masran – Lead Assessor

He graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018 and endorsed MSPO Lead Auditor Course in October 2018. During this assessment, he assessed on the aspects of environmental and estate best practise. He is fluent in Bahasa Malaysia and English languages.

Elzy Ovktafia - Team Member

She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates.

Accompanying Persons: N/A

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were two (2) Minor nonconformities raised. The UIE Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Minor Nonconformities:		
Ref	Area/Process	Clause
1782156-201904-N1	UIE POM	4.3.1.4 Part - 4
Requirements:	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	
Statement of Nonconformity:	Monitoring of the changes in regulatory requirement is not effectively implemented.	
Objective Evidence:	The mill has yet to acquire Contravention License from DOE on the violation of the DOE Compliance Scheduled no 004239 clause no 23 under 'Pengurusan/Kawalan pencemaran Udara' for the operation of 2 old boilers. The new boiler equipped with VORCEP system is still in the midst of completion.	
Corrections:	Corrections: 1. The mill management have obtained the letter from DOE on the application of contravention license for the boiler with dust emission exceeding the permissible limit (Attachment 1) and incorporated in the summary list for tracking of laws. (Attachment 2, Page 2) 2. The mill management have submitted the application of contravention license to DOE on 15th June 2019 (Attachment 2, Page 3).	
Root cause analysis:	The mill management did not receive the circular issued by DOE on the application of contravention license under EQA (Clean Air Regulation) 2014.	
Corrective Actions:	1. The mill management will maintain close follow-up with DOE and MPOA on any circular made with regards to EQA (Clean Air Regulation) 2014. The person in-	

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	<p>charge of the communication/follow-up on the above matter is the Deputy Group Engineer, Mr. K. T. Somasegaran.</p> <p>2. In order to comply with the above regulation, the mill management has decided to install VORSEP for the old boilers. (Sample of quotation received on 23rd April 2019 – Attachment 2, Page 1).</p>
Assessment Conclusion:	<p>Evidence submitted</p> <ol style="list-style-type: none"> 1. Letter form DOE to MPOA Chairman regarding application of contravention license. 2. Quotation No. : VH/Q/1589/DT/04/19 <p>Subject: Supply, Deliver, Install Test, And Commission One (1) Unit Double Stage Vortex Tube Dust Collector For The Sharing Of 25 TPH Boiler And 18 TPH Boiler In UIE, Perak.</p> <p>All the corrective action were found to be adequate. Effectiveness of the implementation will be confirm on next assessment visit</p>

Minor Nonconformities:		
Ref	Area/Process	Clause
1782156-201904-N2	UIE Estate	4.6.1.1 Part 3
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	
Statement of Nonconformity:	Standard Operating Procedures established is not covering all aspect in FFB Evacuation	
Objective Evidence:	The estate has established the Standard Operation Procedure on FFB Evacuation – Buffalo Drawn Carts. The SOP established on focusing on the handling and safety of the buffalo handler and not covering on the buffalo healthcare.	
Corrections:	<ol style="list-style-type: none"> 1. The estate management further updated the SOP and checklist for buffalo management (Attachment 3 and 4). 2. The estate management has contacted Department of Veterinary, Manjung to conduct tagging and vaccination for all 42 buffaloes (Attachment 5). 	
Root cause analysis:	The estate management did not include the buffalo vaccination programme in the Standard Operating Procedure (SOP) and checklist for buffalo management.	
Corrective Actions:	<ol style="list-style-type: none"> 1. The estate management will fully adhere to the SOP for buffalo management and maintain full records of buffalo management including vaccination and deworming. 2. The estate manager will conduct training for the officers who in-charge of buffalo management. 3. An email has been sent by HRESH Department to all Estate Managers in UP Group to include buffalo vaccination programme in the SOP and checklist. (Attachment 6). 	
Assessment Conclusion:	<p>Evidence Submitted</p> <ol style="list-style-type: none"> 1. SOP for Buffalo Management System 2. Buffalo Management Monthly Checklist 3. Application letter to Veteriner Department Manjung on Buffalo Vaccination and Tagging Program. 	

	All the corrective action were found to be adequate. Effectiveness of the implementation will be confirm on next assessment visit
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Noteworthy Positive Comments	
1	Good cooperation from the management during the audit.
2	Good document retrieval

3.3 Status of Nonconformities Previously Identified and OFI

Ref	Area/Process	Clause
1648218-201804-M1	UIE POM and supply base (part 4 and part 3)	4.3.1.1
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations	
Statement of Nonconformity:	Compliance to the EMPLOYMENT ACT 1955 is not effectively implemented.	
Objective Evidence:	<p>UIE POM</p> <p>There is 2 female employee ID: 415066 and 404125 have worked for night shift (after 10 pm) as per pay slip for Dec'17, Feb'18 and May'18 and there is no approval from Jabatan Tenaga Kerja as per Act 265 EMPLOYMENT ACT 1955, PART VIII, EMPLOYMENT OF WOMEN, Prohibition of night work:</p> <p>34. (1) Except in accordance with regulations made under this Act or any exemption granted under the proviso to this subsection no employer shall require any female employee to work in any industrial or agricultural undertaking between the hours of ten o'clock in the evening and five o'clock in the morning nor commence work for the day without having had a period of eleven consecutive hours free from such work:</p> <p>Provided that the Director General may, on application made to him in any particular case, exempt in writing any female employee or class of female employees from any restriction in this subsection, subject to any conditions he may impose.</p>	
Corrections:	<p>i. Management will develop a comprehensive LRR for all applicable laws with a column to indicate for person in-charge and to ensure that the fine lines in the laws are complied.</p> <p>ii. Application has been made and submitted to Labour Department on 23rd June 2018 and awaiting their formal approval. <i>Please refer to Appendix 1 (Page 2).</i></p>	
Root cause analysis:	The management did not diligently follow the Legal Requirements Register (LRR).	
Corrective Actions:	<p>i. A training session will be conducted for the respective person in-charge of the various LRR.</p> <p>ii. Management have identified all business units under United Plantations Berhad which employed female workers who work in between 10pm to 5am. Besides UIE POM, Ulu Bernam Optimill and Bernam River Ulu Group Hospital (BRUGH) also employed female workers who serve between 10pm to 5am. Therefore, the</p>	

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	application has been submitted to ensure all of our business units comply with the above regulations. <i>Please refer to Appendix 1 (Page 1 & 3).</i>
Assessment Conclusion:	During the MSPO ASA 1 Audit, it was verified that the JTK permit for female nightshift already obtained by UIE POM and the conditions were adhered where the rest time, shift working hour and agreement has been made mutually to both of female workers, namely Rohaida and Ramai. The effectiveness of major NC was satisfactorily closed.

3.4 Issues Raised by Stakeholders

IS #	Description
1	Issues: Contractors – They informed that they are invited to attend the stakeholder meetings and have good knowledge on MSPO. They were briefed on the policies and they have signed on the Memorandum of Agreement prior to work. Payment was made promptly.
	Management Responses: The management will continue to maintain good relationship with the contractors.
	Audit Team Findings: No issue.
2	Issues: Local Communities (Kg Sg. Batu) – He told that they have good relationship with the management. He informed that no land dispute has occurred. Demarcation of the land with trenches and bunds were available. He is feeling grateful that the management has provided trainings on PPE usage and handling of peat soil to them as well. He is aware of the complaint procedure.
	Management Responses: The management will maintain good relationship with the local communities and provide any CSR if necessary.
	Audit Team Findings: No issue.
3	Issues: Workers’ Representatives – They are happy to work in the company. Free and new housing are provided to them. Wages are accordingly to the Minimum Wage Order 2018. They were treated equally without discrimination of nationality and races. They are allowed to move freely without restriction.
	Management Responses: The management will ensure the workers are treated equally.
	Audit Team Findings: No other issue.
4	Issues: Gender Representatives – They are aware of the function of the committee and reported that there was no sexual harassment case reported. They were given equal opportunity to work in the company.
	Management Responses: The management will ensure the welfare and safety of female workers are protected.
	Audit Team Findings:

No further issue.

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1648218-201804-M1	Major	21/6/2018	Closed
1782156-201904-N1	Minor	12/6/2019	Open
1782156-201904-N2	Minor	12/6/2019	Open

3.6 Summary of the findings by Principles and Criteria

MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder

Criterion / Indicator	Assessment Findings	Compliance	
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	United Plantation Berhad has established MSPO policy which signed by Chief Executive Director, Dato’ Carl Bek-Nielsen effective date 29th March 2018.	Yes
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment for key legal, social and environmental consideration with the objective of improving the milling and estate operation. The policy has included these elements of: i) Management commitment and responsibility ii) Transparency iii) Compliance to legal requirements iv) Social responsibility, health, safety and employment condition v) Environment, natural resources, biodiversity and ecosystem services vi) Best practices vii) Development of new planting	Yes

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit process is documented under Internal Audit Procedure, dated 15.02.2019, revision 1. Annual audit schedule for 2019 was made available for review. UIE POM and its supply bases was scheduled to have the internal audit on May 2019. The first MSPO internal audit was carried out on 1 st & 2 nd March 2019 by pool of trained internal audit from HREHS department. Cross department/mill audit was demonstrated to ensure impartiality of audit.	Yes
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal audit procedure, dated 15.02.2019, revision 1 established and used as reference for audit process. Audit results documented under internal audit summary dated 1 st & 2 nd March 2019. 28 findings for both RSPO-MSPO were raised. The action plan was submitted to Group Manager HR ESH for closure. The findings were closed on 08/3/2019.	Yes
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Internal audit report and verification report dated 1 st & 2 nd March 2019 was made available to the management for review.	Yes
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	UPB is RSPO certified. The last management review was conducted on 26/03/2019. The management review had included internal and external sustainable palm oil audit results review. The status of the correction and preventive actions are being discuss and reviewed.	Yes

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Among the continual improvement plan were as below: 1. Reduction in chemicals for mature & immature oil palm. 2. Field-paths: service-cutting only 3. Palm circle rows sprayed = GAP via Maxi-Boom	Yes
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	Provisions were made in the annual and forecast business plans / budgets for the necessary resources including training, to implement the new techniques. Sighted the UIE Estate’s Annual Budget 2018, Capital Expenditures – Fixed Assets – Estates for Maxi boom (2 units 600/800 litres Spray Tanks & Fittings at RM 12,500.00 each and costing for 1 unit Maxi Boom for Kuala Bernam Estate.	Yes
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	UIE Estate has the SOP for Maxi Boom which include before, during & after spraying, how to operate, spray pattern with different nozzles, maintenance cost. Person in charge appointed was Tractor Pool A-Team.	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			

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Criterion / Indicator		Assessment Findings	Compliance
4.2.1.1	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders. There is also Grievance Redressal procedure which has steps to be followed to solve issues raised by workers.</p> <p>The time frame to provide feedback to the stakeholder is documented to be total of 24 days for internal and 30 days for external complaint. The officer-in-charge for estate is Mr Geoffrey Cooper as per appointment letter dated 29.03.2018 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.</p>	Yes
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>United Plantation continued to use the group website for disseminating public information. The Sustainability Report and Group Annual report is available in website.</p> <p>Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the mill.</p> <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Procedure for complaints and grievances were available through UP website and medium used are via suggestion box in office or write in to UP head office.</p>	Yes
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p>	<p>The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders. There is also</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Grievance Redressal procedure which has steps to be followed to solve issues raised by workers.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	The officer-in-charge for estate is Mr Geoffrey Cooper as per appointment letter dated 29.03.2018 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Yes
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Stakeholder’s list for both UJE POM and UJE Estate including all the internal and external party such as OSHA committee, Gender Committee, Temple Committee, Statutory Bodies, Penghulu & Ketua Kampung, Local Bankers and others as updated on 25.03.2019.	Yes
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	SOP for Traceability rev:01 dated 15/2/19 describes the procedure for monitoring and to ensure accuracy of sustainable and non-sustainable receipts, dispatches and stock balance to conform to the requirement of MSPO. These includes both miller’s and grower’s traceability ID/label for locomotives: a. Date of harvest b. Gang number c. Field number Delivery order (DO) indicated the details of: a. Cages number b. DO number	Yes

Criterion / Indicator		Assessment Findings	Compliance
		c. Buyer/recipient d. Date e. Field number f. RSPO & MSPO certificate number & validity date The traceability procedure has covered the procedure for external supplier which including the pre and post traceability. Certified FFB (coming from own estates) will carry the ID of certified crop. UIE POM received only own group estate's FFB. The weighbridge ticket will be issued during the delivery of FFB from the estate to mill as well as delivery of CPO and PK from mill to refinery.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	There is an internal audit conducted on 1 st & 2 nd March 2019 by HRESH team to inspect the compliance with traceability procedure in estate.	Yes
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The officer-in-charge for estate is Mr Geoffrey Cooper as per appointment letter dated 29.03.2018 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Yes
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	There is no sale of the FFB as UIE estate is the only supply base to UIE Mill, and belongs to the United Plantation Berhad. Sampled the weighbridge ticket provided the following details: Weigh chit no: 0000101087 Product: FFB	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		Field No: 79 LF Vehicle No: TF038 Date: 04/06/19 Net weight: 3750 kg	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	UIE POM has continued to comply with local, state, national and ratified international laws and regulations. Related permits and licenses were made available and valid as the time of assessment. Sampled of licenses and permit checked: <ol style="list-style-type: none"> 1. JTK Permit for Night shift work for female, BHG PU/9/135 Jld 14 (8) dated 19.07.2018 to UPB-UIE. 2. JTK Permit for salary advance, no siri: 0232 to UIE (M) Sdn Bhd dated 30.08.2008. 3. KDN Kuota Approval for UPB for 1000 workers valid from 28.05.2018 to 27.11.2019. 4. JTK Permit for salary deduction as per Employment Act 1955 dated 01.06.2012. 	Yes
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	UIE POM continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation. Each office of the operating unit (mill	Yes

Criterion / Indicator		Assessment Findings	Compliance
		and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers' Minimum Standard of Housing and Amenities Act, to name a few.	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	UIE POM has various mechanisms to ensure the legal requirements are complied with. In LRR format there is a column to report the status of compliance which was utilized to report the compliance status of all the applicable legal requirements. Other information available in the format was document/action plan needed, PIC and frequency of monitoring. For any new changes in law, the management has updated in in separate list of monitoring the changes in law. On top of that, there was a list of licenses which have the information about type of license, expiry date and validity period.	Yes
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	The Company Secretary [Mr. C. Mathews (HQ)] will track and update any changes in the law. Among the method or platforms used for tracking are: <ul style="list-style-type: none"> • Internet subscription such as Lawnet.com • News and announcement from statutory bodies and government departments such as SOCSO, EPF, etc. • Participation of associations and seminars such as Malayan Agricultural Producers Association (MAPA), Malaysian Palm Oil Association (MPOA) 	Yes

Criterion / Indicator		Assessment Findings	Compliance						
		Example for new changes sighted were Minimum Wage Order (Amended) 2018 – starting in 01.01.2019 RM 1100 on 30.11.2018, Employees Provident Fund Act 1991 (ACT 452), minimum monthly contributions for employees upon attending the age of 60 years and above on 09.02.2019.							
Criterion 4.3.2 – Lands use rights									
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The total area for all land titles are 10,369.26 Ha for all Estate 1, Estate 2 cross referenced with Annual Report 2018 for UIE estates. Sampled below land title: <ol style="list-style-type: none"> 1. HSD No: 21323 2. Negeri: Perak 3. Daerah: Manjung 4. Bandar/Pekan/Mukim: Mukim Pengkalan Baharu 5. No lembaran: 658, 659, 673, 686, 699, 1034, 1035, 1037, 1038 & 1041 6. No lot: Lot 17029 7. Luas Sementara: 121 Ha 	Yes						
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	United Plantation Berhad (UPB) aquired all the land directly from the Perak State government. There were no issues of land disputes recorded. All land title were kept in the office and available for review. <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th>Grant</th> <th>Lot No.</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Grant	Lot No.	Hectare				Yes
Grant	Lot No.	Hectare							

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Criterion / Indicator		Assessment Findings			Compliance
		21321	17027	2316.0000	
		352537	10425	121.0000	
		21320	17026	3845.0000	
		352535	10423	142.8000	
		21421	1343	39.4600	
		21420	1342	3895.0000	
		2452	1189	3.2451	
		22197	1188	6.6975	
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>The perimeter survey map of the land portion is provided together with the land title and verified by Supian bin Manap, Penolong Pentadbir Tanah Manjung. The map is provided with the coordinated demarcation.</p> <p>Boundary was demarcated with white concrete slap with information such as point no, field and coordinate. Sighted the boundary marker PT 18 at field 90 boundary with Ladang Raja Hitam</p>			Yes

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Standard Operating Procedure for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC) – RSPO Principles is documented the process in handling land dispute settlement.	Yes
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land for the portion of land.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary land for the portion of land.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land for the portion of land.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>The Social Impact Assessment (SIA), Action Plan (SAP) & Review Plan (SRP) 2019, was conducted for UIE Mill & Estate internally and annually by the Internal Management involving all stakeholders.</p> <p>The latest SRA was conducted in 25 March 2019. Key areas identified in the SRA was on access and use rights, economic livelihoods and working conditions, human rights, estate operation (nursery, replanting, weeding, pruning, guest workers and others).</p> <p>The recommendation from the SIA report was transferred to action plan (Social) 2019. The action plan identified the issues & strategies, action plan, responsible person and time frame.</p>	Yes
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders.</p>	Yes
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>Sighted the Registry of Complaints book recording all the feedback and request from stakeholders, together with its completion date. Also, for external stakeholders, request or feedback to be made directly to the main office through verbal and letter.</p> <p>Example: 25.03.2019 = Mr. Suresh (HA): Needs to conduct CPR training together with Klinik Kesehatan Pantai Remis.</p>	Yes
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p>	<p>The Registry of Complaints book is made available in the Mill & Estate office. In case the complainant would want to make an anonymity,</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	they can email to the company secretary. This information is available in United Plantation Website and suggestion box in mill office.	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Interview conducted with workers to confirm their understanding of the complaint and grievance process. There is no critical grievance recorded for the pass one year. Only request for maintenance and house repairs are made by workers.	Yes
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Seen the complaint recorded since 2012 in Registry of Complaints book and stakeholders request available during audit.	Yes
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Estate management have made contribution to the internal and external stakeholders. As seen in Annual Report 2018 book, for the whole group, United Plantation has the actual amount as below: <ol style="list-style-type: none"> 1. Hospital & medicine for employees, dependents and nearby communities RM 2,424,918 2. Retirement benevolent fund RM 531,338 3. Education, welfare, scholarships & others RM 298,841 4. Bus subsidy for school children RM 206,377 5. External donations RM 127,359 	Yes

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		Other example sighted: Donation to SRA Rakyat Taufiqiah on 03.05.2018 for RM 300. Sighted the cheque payment voucher: 628030218 on 07.05.2018.1	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	United Plantation Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/8/2017. The policy was communicated to all the employees through training, briefing and displayed at notice board in several designated location in multi-lingual version (English, Bahasa Malaysia, Bengali, Hindi and Nepal). UIE Estate has established Safety and Health Plan. Sighted the implementation of the plan as follows: i. Medical surveillance was conducted on 18 Feb 2019 at Dr Shoba Vijaya Ragaven (HQ/14/DOC/00380) from Kump Poliklinik Manjung Sdn Bhd. 67 person including welders and sprayer sent to the medical surveillance and all workers was fit to work with chemical.	Yes
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices	United Plantation Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/8/2017. The policy was communicated to all the employees through training, briefing and displayed at notice board in several designated location in multi-lingual version (English, Bahasa Malaysia, Bengali, Hindi and Nepal). The estate has conducted risk assessment for all main and support operations in the estate and documented in the HIRARC register. The HIRARC was reviewed and minimum of once a year or if accident	Yes

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<ul style="list-style-type: none"> ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 	<p>occurred. Latest review was conducted on 22/5/2019 due to accident occur in April 2019.</p> <p>The estate established training program for all type of work includes the employee exposed to pesticides. The training was conducted by the Manager, Asst. Manager, Executives or Chemical Supplier with knowledge in the chemicals handling. Sighted the training records as follows:</p> <ul style="list-style-type: none"> i. Schedule Waste handling training dated 24/4/2019 ii. Safety in Spraying technique training dated 7/1/2019 <p>Records were available of PPE issued to individual workers and contractors, including signatures to confirm receipt. PPE standard is based on CHRA assessor's recommendation, SOP and HIRARC.</p> <p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. The management of the empty chemical containers is guided by a procedure entitled "Standard Operating Procedure (C) Triple Rinsing Empty Pesticide Containers", dated 26/5/2016. Based on the procedure, the empty containers must be triple rinsed, punctured and sold to recycler.</p> <p>The estate has established Safety and Health committee led by the estate Manager as Chairman. The chairman has appointed the safety and health committee consist of management and employee representatives. The committee conducted the meetings on quarterly</p>	

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Criterion / Indicator	Assessment Findings	Compliance	
<p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>basis to discuss issues regarding safety and health. Latest meeting was conducted on 13/3/2019 and 15/12/2018.</p> <p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency Response Team incorporated under OSH organization chart for 2019. Workers trained in firefighting, rescue method and prepared for the any unforeseen circumstances. Latest ERP training was conducted on 21/4/2019.</p> <p>First aid box were available at few stations in the estate. The mandore was appointed as first aider for each work group. Noted during interview with the workers shows awareness on the locations and basic first aid treatment. Latest first aid training was conducted on 14/2/2019.</p> <p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 & 8.</p>		
Criterion 4.4.5: Employment conditions			
<p>4.4.5.1</p>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>UIE Estate implemented their Human Rights Policy, signed by Dato' Carl Bek-Nielsen on 18.8.17. The management is treated the workers with respect and dignity. Awareness training on human rights policy has been conducted on 10-14/02/2019 to all 221 workers.</p>	<p>Yes</p>
<p>4.4.5.2</p>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment</p>	<p>Migrant workers are recruited with 3 years contract except for Indonesian workers where the contract is for 2 years. Local workers</p>	<p>Yes</p>

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<p>regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electric supplier (connect to national water and electricity supply) and medical care are given to all employees without discrimination.</p>	
<p>4.4.5.3 Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>All the workers are under direct employment. The pay slip has included basic income, allowance pay, working days, medical leave, and deduction of salary and others as per employment contract. The payroll for the following sampled workers for January, May and May 2019 were verified to be consistent with the Minimum Wages Order 2018.</p> <p>Sampled workers seen as below:</p> <ul style="list-style-type: none"> a. Estate worker ID (Malaysian): 120519 b. Estate worker ID (Nepalese): 112778 c. Estate worker ID (Indonesian): 89 d. Estate worker ID (Bangladesh): 305080 e. Estate worker ID (India): 205386 <p>There was no records or complaint observed during the interview with workers. All the sampled workers for direct employment and contract workers were achieved the minimum wage accordance to Minimum Wage Order 2018 which achieved RM 1100/ month or RM 42.30/day.</p>	<p>Yes</p>
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the</p>	<p>There is no contract worker in estate. All workers are directly hired to work under UIE Estate.</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>		
<p>4.4.5.5 The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The workers master list was reviewed. The list includes date of birth, date joined, gender etc.</p>	<p>Yes</p>
<p>4.4.5.6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The following contracts has been verified to confirm that workers have binding working agreement with the company:</p> <ul style="list-style-type: none"> a. Estate worker ID (Malaysian): 120519 b. Estate worker ID (Nepalese): 112778 c. Estate worker ID (Indonesian): 89 d. Estate worker ID (Bangladesh): 305080 e. Estate worker ID (India): 205386 <p>Interview with the workers confirms that they have a copy of the employment contract and they understood the conditions stated in the contract.</p>	<p>Yes</p>
<p>4.4.5.7 The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p>	<p>There is face recognition for UIE Estate to records the accurate working hours and overtime and recorded in UIE TMS Master Report.</p> <p>Verified the overtime and working hours:</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	a. Estate worker ID (Malaysian): 120519 b. Estate worker ID (Nepalese): 112778 c. Estate worker ID (Indonesian): 89 d. Estate worker ID (Bangladesh): 305080 e. Estate worker ID (India): 205386 The terms of employment is as per MAPA/NUPW.	
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	There is face recognition for UIE POM to records the accurate working hours and overtime and recorded in UIE TMS Master Report. In case the worker is on leave or absence, it is recorded in the same system.	Yes
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker's employment contract.	Yes
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	The company provides free medical benefit to worker's dependent at the estates clinics. As seen in Annual Report 2018 book, for the whole group, United Plantation has the actual amount as below: 1. Hospital & medicine for employees, dependents and nearby communities RM 2,424,918	Yes

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> 2. Retirement benevolent fund RM 531,338 3. Education, welfare, scholarships & others RM 298,841 4. Bus subsidy for school children RM 206,377 5. External donations RM 127,359 	
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>The basic amenities and facilities at the quarters provided by the company to its workers include electricity, water and domestic waste disposal. Electricity and water is provided by government. Usage of electricity and water given with subsidize rate for the worker's contract.</p> <p>During the linesite visit, it was observed that the housing is in good conditions. New houses were built with spacious and convenient for workers. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 6 people with 3 bedrooms with 2 toilets per house.</p> <p>Linesite inspection was conducted in weekly basis by Hospital Assistant in both mill and estate.</p>	<p>Yes</p>
<p>4.4.5.12 The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Gender Policy signed by Dato Carl Bek-Nielsen, dated 24.4.15 mentioned that the company endeavour to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work.</p>	<p>Yes</p>
<p>4.4.5.13 The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees</p>	<p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade</p>	<p>Yes</p>

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<p>shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>union. The workers have their freedom to join the NUPW/MAPA union but in UIE, the workers have form internal worker’s union.</p> <p>The latest minutes of meeting of guest worker’s committee is sighted dated 15.05.19 and attended by 25 workers.</p>	
<p>4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>The Human Rights Policy was established on 18.08.2017 signed by Dato Carl Bek-Nielsen. The Policy covers the commitment to not condone forced labour or child labour who under 16 years old.</p>	Yes
Criterion 4.4.6: Training and competency		
<p>4.4.6.1 All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>The estate has established training program for all management, employee and contractors as per training need analysis conducted. The training records has been maintained and available for review. Sighted the training records as follows:</p> <ul style="list-style-type: none"> i. Policy communication training dated 10/2/2019 ii. FFB evacuation Buffalo Drawn carts training dated 20/5/2019 iii. Mechanization Training dated 17/5/2019 iv. Safety in Rubbish Pit Operation training dated 20/3/2019 	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The estate has conducted training need analysis to identify the training required for each workers. The analysis was conducted base on job designation and type of training required.</p>	Yes
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>The estate reviewed the training need analysis and program on annually basis to ensure the continuous training for all workers. Training program and records was maintained and available for review.</p>	Yes
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>United Plantations Berhad (UPB) has established a public policy on environmental and biodiversity. The policy incorporated the element of no deforestation. The latest version of policy dated 18/8/2017 was signed by UPB’s Chief Executive Director, Dato’ Carl Bek-Nielsen.</p>	Yes
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>The estate has conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment. The analysis was reviewed on annually basis. Latest review was conducted on 25/3/2019.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		The estate has established the Environmental Management Plan base on the Environmental Risk Assessment conducted.	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estate has established the Environmental Management Plan base on the Environmental Risk Assessment conducted.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>i. Sighted the vehicle maintenance records for all machine and vehicle. It was documented in the form '250 – 1000 hours service schedule for tractors/vehicle/machineries'. The records were available at the workshop office for review.</p> <p>ii. Sighted the records of EFB disposal FY 2018 at 49393 ton for 593 ha.</p> <p>iii. Dedicated workers were assigned to segregate the recyclable items and dispatch to waste managers. Sighted the waste disposal records as at May 2019 amounted RM 4422.00</p> <p>iv. Reduced usage of chemicals by using mechanical movers in harvesting avenues and road edges. Sighted during site visit, all harvesting path were maintained by mechanical movers.</p> <p>iv. Sighted the records of scrap metal sold as at May 2019 at 53960 ton amounted at RM 45.132.30</p>	Yes
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The continual improvement plan towards recycling of waste was sighted. Among program that has been implemented:</p> <p>41. Zero Burn Replanting Policy</p>	Yes

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		42. Empty Fruit Bunch Use by Estates 43. POME USE – by the Estate 44. Empty Fertilizer Bags Utilization 45. Scrap Metal Sold – UIE Estates 46. Spent Batteries/Dispatches to Waste Manager 47. Spent Lubricants/Dispatches to Waste Manager 48. Spent Fuel Filters/Dispatched to Waste Manager 49. Triple Rinse Pesticide Containers sent to Waste Manager 50. Clinical and Domestic Waste Disposal	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estate has established training programs that covered aspects of the MSPO & RSPO requirements, with regular assessments of training needs. The training on RSPO & MSPO awareness included on the policy and objectives of the environmental management and improvement plans.	Yes
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The management conducted meeting to discuss the environmental quality ion annually basis. Sighted the latest minutes meeting of UP Group Sustainability Committee conducted on 17/4/2019.	Yes
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends	The estate maintain the monthly monitoring records of fossil fuel usage recorded Diesoline Usage (Mill+Estate) in liters. Diesel usage FY 2018	Yes

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	shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	recorded at 515441 liters and FY 2019 as at May 2019 recorded at 200330 liters. The plan to assess the non-renewable energy was documented in the Environmental Management Plan.	
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of nonrenewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Yes
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The use of renewable energy is from biogas engine and started on 21st November 2016 for generation of green power.	Yes
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The estate had identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows: Domestic waste – rubbish from the mill complex and employees quarters (disposed by estate management) Recycled waste – scrap iron, plastic, glass, metal, paper Scheduled waste – filter, lubricants, hydraulic oil, grease, used batteries	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.3.2 A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	<p>The estate has established waste management plan base on the waste identified and documented in Types of Waste Products and Method of Disposal, Action Plan to Reduce Waste. Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. Dedicated workers were assigned to segregate the recyclable items and dispatch to waste managers. Sighted the waste disposal records as at May 2019 amounted RM 4422.00 ii. EFB recycle and applied in the estate field as mulch. Sighted the records of EFB disposal FY 2018 at 49393 ton for 593 ha. 	<p>Yes</p>
<p>4.5.3.3 The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The estate and mill has established flow chart for Scheduled Waste Handling for all scheduled waste generated such as SW 102, SW 305, SW 410, SW 409 and SW 404. The SW handling as per regulation.</p> <p>The mill also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Observed during workers interview with storekeeper shows the understanding the proper disposal for waste as all used lubricant and contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area.</p> <p>Sighted the disposal records for SW generated as follows:</p> <ul style="list-style-type: none"> i. 1/6/2019 for SW 409; C/N no: 20190601124NMYTG ii. 1/6/2019 for SW 110; C/N no: 2019060112JVWIA5 	<p>Yes</p>

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Criterion / Indicator		Assessment Findings	Compliance
		iii. 29/5/2019 for SW 306; C/N no: 20190530013YT7SA0 iv. 29/5/2019 for SW 305; C/N no: 20190530013YF24B0 v. 5/3/2019 for SW 306; C/N no: 2019030517W4J32H vi. 5/3/2019 for SW 410; C/N no: 2019030517ES20GA vii. 5/3/2019 for SW 409; C/N no: 2019030517RJ0AMD	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance -	Empty chemical container were triple rinse, punctured and stored at designated storage area before send to licensed collectors for disposal as SW 409. The estate maintained the inventory records in Empty drum records before notified DOE through E-SWISS, Fifth Schedule. The records were available for review at the office.	Yes
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic waste was disposed as such to minimize the risk of contamination of the environment and watercourses. Domestic waste stored in bins at housing areas were removed using tractors twice a week and sent to designated dumping area/landfill. No open burning of Domestic Waste was observed during the visit.	Yes
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	The estate conducted assessment on all polluting activities during aspects and impacts analysis and documented in the Environmental Risk Assessment. The analysis was reviewed on annually basis. Latest review was conducted on 25/3/2019.	Yes

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The estate has established the action plan to reduce significant pollutants and emissions and documented in the Environmental Action Plan and Types of Waste Products and Method of Disposal, Action Plan to Reduce Waste.	Yes
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.	The estate has established the water management plan. The plan focusing on: i. Management of acid sulphate soil, raised and maintained above the pyritic layer as far as long as possible ii. Water table for acid sulphate area should be maintain about 45 – 60 cm form soil surface virtually throughout the year iii. Beneficial to maintain water tables 60 – 90 cm in non-acid sulphate soil to minimize stress during drier periods and in peat areas it should be maintain at mean of 60 cm below ground surface iv. Included therein are inspection of Watergates, flap-gate, wooden weirs, sandbag weirs, water pumps and irrigation. v. For high rainfall (>150 mm/mth) – drainage and for low rain fall (<150 mm/mth) – irrigation. At onset of dry spell, install sandbags for rain harvesting, operating water pumps, weir platforms to be raised while during high tide, allow natural in flow of water. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed	Yes

Criterion / Indicator	Assessment Findings	Compliance																						
<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>in the SOP No 12: Protection of River Reserves (Riparian & Buffer Zone). The buffer zones established are as following:</p> <table border="1" data-bbox="1048 507 1868 903"> <thead> <tr> <th>River width</th> <th>Buffer zone width</th> </tr> </thead> <tbody> <tr> <td>1 – 5</td> <td>5</td> </tr> <tr> <td>5 – 10</td> <td>10</td> </tr> <tr> <td>10 – 20</td> <td>20</td> </tr> <tr> <td>20 – 40</td> <td>40</td> </tr> <tr> <td>> 40</td> <td>50</td> </tr> </tbody> </table> <p>Sighted during site visit at the riparian zone for Sg. Anak Machang at field 90 a, the vegetation were very well maintained and planted with forest trees. No evidence of chemical application along the riparian zone.</p> <p>River water sampling were conducted once a year. Latest sampling was conducted on 19/11/2018. The water sampling result as follows:</p> <table border="1" data-bbox="1048 1145 1868 1276"> <thead> <tr> <th>Sampling Point</th> <th>Bruas River Inlet</th> <th>Bruas River Outlet</th> <th>Sg. Anak Machang Inlet</th> <th>Sg. Anak Machang Outlet</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	River width	Buffer zone width	1 – 5	5	5 – 10	10	10 – 20	20	20 – 40	40	> 40	50	Sampling Point	Bruas River Inlet	Bruas River Outlet	Sg. Anak Machang Inlet	Sg. Anak Machang Outlet						
River width	Buffer zone width																							
1 – 5	5																							
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> 40	50																							
Sampling Point	Bruas River Inlet	Bruas River Outlet	Sg. Anak Machang Inlet	Sg. Anak Machang Outlet																				

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Criterion / Indicator		Assessment Findings				Compliance	
		Water Quality Class	III	III	III	IV	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Both Sg. Bruas and Sg. Anak Machang is not cross to the field estate and during the field visit, there is no construction of such was observed.				Yes	
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	During the site visit there is no practices of water harvesting are noted in the UIE Estate because housing area is using the government water supply while for nursery using the water source from lagoon. In addition, all fields in UIE estate mostly are in flat terrain and the soil is alluvium type which has the high water table, therefore moisture pit is not built.				Yes	
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value							
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status	UIE has the Environment and Biodiversity Policy signed by Dato' Carl Bek-Nielsen on 18/8/17. The high biodiversity is included in the HCV assessment report dated 4/1/ 2008 by Wild Asia. 128 Birds, 11 mammals, 6 reptiles and 20 dragonflies were identified based on the latest HCV report. Within the bird fauna, a total of 4 globally endangered species were recorded such as Malaysian Blue Flycatcher, Long-tailed Parakeet, Rhinoceros Hornbills and Black Hornbills.				Yes	

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Criterion / Indicator		Assessment Findings	Compliance
	<p>on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>The established management plan has been incorporated the Self-Assessment-List of HCVs Identified (HCV Monitoring) updated annually.</p>	
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>According to the HCV report, there are no RTE species (according to IUCN classification) sighted at the operating units.</p> <p>The estate continuously conducted awareness training to ensure the employee aware regarding the Environment and Biodiversity Policy. Latest training was conducted on 13/3/2019.</p> <p>Sighted the prohibition of illegal hunting were erected at several strategic area in the estate. The estate conducted HCV Study Report Self-Assessment on annually basis. The estate maintain and record the Wildlife Monitoring Records.</p>	Yes
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>All operating units have developed Management Plan for the HCV and conservation area to protect from any encroachment. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. The estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of fires.</p>	Yes
Criterion 4.5.7: Zero burning practices			

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	United Plantation Berhad has established the Zero Burning Policy dated 18/8/2017 signed by the UPB's Chief Executive Director. United Plantation Berhad has also established the SOP for Replanting dated 18/2/2008. In the SOP stated the prohibition of burning in land preparation. Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	Yes
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	United Plantation Berhad has also established the SOP for Replanting dated 18/2/2008. In the SOP stated the prohibition of burning in land preparation. Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	Yes
4.6 Principle 6: Best Practices			

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The SOP for the estates are available which is prepared on Group and Estate basis. Seen the SOP signed by Senior Executive Director on 10/12/07. The EXCOM visited the operating units on timely basis. Their reports covers on all aspect of operation. Latest EXCOM visit conducted on 14/2/2019. The estate has established the Standard Operation Procedure on FFB Evacuation – Buffalo Drawn Carts. The SOP established on focusing on the handling and safety of the buffalo handler and not covering on the buffalo healthcare.	Minor NC
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	The estates is 100% flat-undulating area which was observed during field visit and as per Topographic Map UIE, Bruas sheet 52. Planting of cover crop, EFB, POME are made to retain the soil structure and conservation.	Yes
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stenciled at the palm trees and also displayed in signage at the boundary/corners of every fields. This is observed during the field visit in UIE Estate.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The annual business plan is available. The estate had an annual budget with a 3 years projection as stated in UIE Estate Annual Budget 2022. This business plan is prepared as guidance for future planning. The budget contains monthly budget per operating units including FFB, CPO and PK. Component of operating expenditure includes Administration, harvesting & collection, field upkeep, transportation, road and bridges, labour overhead, EVIT (running accounts for engines, vehicles, implements & tractors. Inclusive in the business plan is also Capital Expenditure (CAPEX) includes building-general, tractors and agricultural implement, office equipment and others.	Yes
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	No replanting program in the estate as the replanting program has been completed in 2019.	Yes
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast	This requirement i.e crop material, crop projection, yield, production cost are available. It is provided in the business management plan shown in item 4.6.2.1 above.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed on a monthly basis. The progress report contains the updated actual usage as todate.	Yes
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	FFB supplier mainly from UIE Estate, which is own estate. For contractor, sighted contract for Suresh Rao A/L Nagaiah, Sales contract no: MOA 9141 dated 03.01.2019 for FFB transport.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	This requirement is in compliance. All contracts and purchases are documented i.e in the form of purchase orders, invoices, and contracts for the larger transaction. All documents are signed by both vendor and mill. Sample of contract sighted for Suresh Rao A/L Nagaiah, Sales contract no: MOA 9142 dated 03.01.2019 for Back Hoe service. All contracts terms and conditions were made transparent and agreed from both parties.	Yes
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	UIE Estate had informed its contractors regarding the need to follow the MSPO requirements through MSPO training on 29.05.18. The training was attended by 21 contractors, which Suresh Rao attended the training and received the Stakeholder Booklet, UIE Estate 2019.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with the contractors were verified. Seen also the certificate of payment for Suresh Rao on 01.04.2019, CP no: 62190263 for RM 3155.63.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors are being mentioned in the MSPO Policy signed on 29 March 2018 by Dato Carl Bek-Nielson.	Yes
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	All works performed at the estates are checked and verified by the estates personnel before payment been made to the contractors. Example for Suresh Rao, the progress works are recorded in the PPC 2A book by estate personnel. As at April 2019, total of 76.5 hours X RM 41.25 recorded in contractor's book updated daily by field staff and verified by Assistant and Manager.	Yes
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			

Criterion / Indicator		Assessment Findings	Compliance
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	No development of new planting in UIE estate	NA
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	No development of new planting in UIE estate	NA
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	No development of new planting in UIE estate	NA
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	No development of new planting in UIE estate	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	No development of new planting in UIE estate	NA
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	No development of new planting in UIE estate	NA
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	No development of new planting in UIE estate	NA
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	No development of new planting in UIE estate	NA
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.	No development of new planting in UIE estate	NA

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No development of new planting in UIE estate	NA
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No development of new planting in UIE estate	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No development of new planting in UIE estate	NA
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	No development of new planting in UIE estate	NA

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	No development of new planting in UIE estate	NA
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	No development of new planting in UIE estate	NA
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	No development of new planting in UIE estate	NA
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No development of new planting in UIE estate	NA
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	No development of new planting in UIE estate	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	No development of new planting in UIE estate	NA
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	No development of new planting in UIE estate	NA

MS 2530-4:2013 MSPO Part 4: General principles for palm oil mills.

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	United Plantation Berhad has established MSPO policy which signed by Chief Executive Director, Dato’ Carl Bek-Nielsen effective date 29th March 2018.	Yes
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The established policy has emphasized on the commitment for key legal, social and environmental consideration with the objective of improving the milling and estate operation. The policy has included these elements of: viii) Management commitment and responsibility ix) Transparency x) Compliance to legal requirements xi) Social responsibility, health, safety and employment condition xii) Environment, natural resources, biodiversity and ecosystem services xiii) Best practices xiv) Development of new planting	Yes
Criterion 4.1.2 – Internal Audit			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit process is documented under Internal Audit Procedure, dated 15.02.2019, revision 1. Annual audit schedule for 2019 was made available for review. UIE POM and its supply bases was scheduled to have the internal audit on May 2019. The first MSPO internal audit was carried out on 1 st & 2 nd March 2019 by pool of trained internal audit from HRESH department. Cross department/mill audit was demonstrated to ensure impartiality of audit.	Yes
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal audit procedure, dated 15.02.2019, revision 1 established and used as reference for audit process. Audit results documented under internal audit summary dated 1 st & 2 nd March 2019. 28 findings for both RSPO-MSPO were raised. The action plan was submitted to Group Manager HRESH for closure. The findings were closed on 08/3/2019.	Yes
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Internal audit report and verification report dated 1 st & 2 nd March 2019 was made available to the management for review.	Yes
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	UPB is RSPO certified. The last management review was conducted on 26/03/2019. The management review had included internal and external sustainable palm oil audit results review. The status of the correction and preventive actions are being discuss and reviewed.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Among the continual improvement plan were as below: 4. POME (m3) applied to fields (closed-end furrows) 5. New units 3 X Bedrooms for workers. Further improvements: progress in 2018/19.	Yes
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Provisions were made in the annual and forecast business plans / budgets for the necessary resources including training, to implement the new techniques. The newly project for UIE POM is upgrading of Power Plant (Boiler & Turbine commenced in 2017 and expected completed by July 2019.	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders. There is also Grievance Redressal procedure which has steps to be followed to solve issues raised by workers. The time frame to provide feedback to the stakeholder is documented to be total of 24 days for internal and 30 days for external complaint. The officer-in-charge for estate is Mr K.T Somasegaran as per appointment letter dated 15.02.2019 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Yes

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<p>4.2.1.2 The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>United Plantation continued to use the group website for disseminating public information. The Sustainability Report and Group Annual report is available in website.</p> <p>Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the mill.</p> <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Procedure for complaints and grievances were available through UP website and medium used are via suggestion box in office or write in to UP head office.</p>	<p>Yes</p>
<p>Criterion 4.2.2 – Transparent method of communication and consultation</p>		
<p>4.2.2.1 Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders. There is also Grievance Redressal procedure which has steps to be followed to solve issues raised by workers.</p>	<p>Yes</p>
<p>4.2.2.2 The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p>	<p>The officer-in-charge for estate is Mr K.T Somasegaran as per appointment letter dated 15.02.2019 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.</p>	<p>Yes</p>
<p>4.2.2.3 A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders</p>	<p>Stakeholder’s list for both UIE POM and UIE Estate including all the internal and external party such as OSHA committee, Gender Committee, Temple Committee, Statutory Bodies, Penghulu &</p>	<p>Yes</p>

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<p>shall be properly maintained.</p> <p>- Major compliance -</p>	<p>Ketua Kampung, Local Bankers and others as updated on 01.03.2019.</p>	
<p>Criterion 4.2.3 – Traceability</p>		
<p>4.2.3.1 The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>SOP for Traceability rev:01 dated 15/2/19 describes the procedure for monitoring and to ensure accuracy of sustainable and non-sustainable receipts, dispatches and stock balance to conform to the requirement of MSPO. These includes both miller’s and grower’s traceability ID/label for locomotives:</p> <ul style="list-style-type: none"> a. Date of harvest b. Gang number c. Field number <p>Delivery order (DO) indicated the details of:</p> <ul style="list-style-type: none"> a. Cages number b. DO number c. Buyer/recipient d. Date e. Field number f. RSPO & MSPO certificate number & validity date <p>The traceability procedure has covered the procedure for external supplier which including the pre and post traceability. Certified FFB</p>	<p>Yes</p>

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	<p>(coming from own estates) will carry the ID of certified crop. UIE POM received only own group estate's FFB.</p> <p>The weighbridge ticket will be issued during the delivery of FFB from the estate to mill as well as delivery of CPO and PK from mill to refinery.</p>	
<p>4.2.3.2</p>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Yes</p>
<p>4.2.3.3</p>	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>Yes</p>
<p>4.2.3.4</p>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>UIE POM has continued to comply with local, state, national and ratified international laws and regulations. Related permits and licenses were made available and valid as the time of assessment. Sampled of licenses and permit checked:</p> <ol style="list-style-type: none"> 5. JTK Permit for Night shift work for female, BHG PU/9/135 Jld 14 (8) dated 19.07.2018 to UPB-UIE. 6. JTK Permit for salary advance, no siri: 0232 to UIE (M) Sdn Bhd dated 30.08.2008. 7. KDN Kuota Approval for UPB for 1000 workers valid from 28.05.2018 to 27.11.2019. 8. JTK Permit for salary deduction as per Employment Act 1955 dated 01.06.2012. 9. DOE license, Compliance Schedule no: 004239 valid till 30 June 2019. Method of disposal, land application. BOD @ 5000 mg/l. 10. Energy Commission license, serial no.: 31923 for 2980 kW valid until 20/10/19. 11. MPOB License; no: 500124504000 valid till 31/1/2020 12. Competent person <ol style="list-style-type: none"> a. CePSWAM – certificate no. CePSWAM/01900 	<p>Yes</p>

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		b. CePPOME – certificate no. CePPOME/197414 c. Authorized Entrant and Standby Person for Confine Space - NW-PNG-AGT-R0041-C - NW-PNC-AE-R0099-O	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	UIE POM continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU’s operation. Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers’ Minimum Standard of Housing and Amenities Act, to name a few.	Yes
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	UIE POM has various mechanisms to ensure the legal requirements are complied with. In LRR format there is a column to report the status of compliance which was utilized to report the compliance status of all the applicable legal requirements. Other information available in the format was document/action plan needed, PIC and frequency of monitoring. For any new changes in law, the management has updated in in separate list of monitoring the changes in law. On top of that, there was a list of licenses which have the information about type of license, expiry date and validity period.	Yes

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<p>4.3.1.4 The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Company Secretary [Mr. C. Mathews (HQ)] will track and update any changes in the law. Among the method or platforms used for tracking are:</p> <ul style="list-style-type: none"> • Internet subscription such as Lawnet.com • News and announcement from statutory bodies and government departments such as SOCSO, EPF, etc. • Participation of associations and seminars such as Malayan Agricultural Producers Association (MAPA), Malaysian Palm Oil Association (MPOA) <p>Example for new changes sighted were Minimum Wage Order (Amended) 2018 – starting in 01.01.2019 RM 1100 on 30.11.2018, Employees Provident Fund Act 1991 (ACT 452), minimum monthly contributions for employees upon attending the age of 60 years and above on 09.02.2019.</p> <p>The mill has yet to acquired Contravention License from DOE on the violation of the DOE Compliance Scheduled no 004239 clause no 23 under 'Pengurusan/Kawalan pencemaran Udara'. This shows the monitoring of the changes in regulatory requirement is not effective implemented.</p>	<p>Minor NC</p>
<p>Criterion 4.3.2 – Lands use rights</p>		
<p>4.3.2.1 The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The land title, Grant number, No H.S.(D): 21320 for area of 3845 Ha, registered to United Plantation Bhd on 24/12/04 where UIE POM is includes in this area with estate. The usage of land is for</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
		Commodity Crop-Oil Palm. The land was granted by Kanun Tanah Negara. Sampled one of the quit rent for this portion was made on 07.05.2019 to the Land Authority of Perak State amounted RM 384,500.00.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The land title, Grant number, No H.S.(D): 21320 for area of 3845 Ha, registered to United Plantation Bhd on 24/12/04 where UIE POM is includes in this area with estate. The usage of land is for Commodity Crop-Oil Palm. The land was granted by Kanun Tanah Negara.	Yes
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The map of the land portion is provided together with the land title. The map has provided the coordinated demarcation.	Yes
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Standard Operating Procedure for Land Dispute Settlement, dated 16 August 2016 as per Free Prior & Informed Consent (FPIC) – RSPO Principles is documented the process in handling land dispute settlement.	Yes
Criterion 4.3.3 – Customary rights			

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land for the portion of land.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land for the portion of land.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land for the portion of land.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The Social Impact Assessment (SIA), Action Plan (SAP) & Review Plan (SRP) 2019, was conducted for UIE Mill & Estate internally and annually by the Internal Management involving all stakeholders. The latest SIA was conducted in 25 March 2019. Key areas identified in the SIA was on access and use rights, economic livelihoods and working conditions, human rights and mill operation.	Yes

Criterion / Indicator		Assessment Findings	Compliance
		The recommendation from the SIA report was transferred to action plan (Social) 2019. The action plan identified the issues & strategies, action plan, responsible person and time frame.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders.	Yes
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Sighted the Registry of Complaints book recording all the feedback and request from stakeholders, together with its completion date. Also, for external stakeholders, request or feedback to be made directly to the main office through verbal and letter. Example: 22.05.2019 = Mr. Jennarasu requested to replace light tube at SD 21.	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The Registry of Complaints book is made available in the Mill & Estate office. In case the complainant would want to make an anonymity, they can email to the company secretary. This information is available in United Plantation Website and suggestion box in mill office.	Yes
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Interview conducted with workers to confirm their understanding of the complaint and grievance process. There is no critical grievance recorded for the pass one year. Only request for maintenance and house repairs are made by workers.	Yes

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4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Seen the complaint recorded since 2011 in Registry of Complaints book and stakeholders request available during audit.	Yes
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Mill management have made contribution to the internal and external stakeholders. As seen in Annual Report 2018 book, for the whole group, United Plantation has the actual amount as below: 6. Hospital & medicine for employees, dependents and nearby communities RM 2,424,918 7. Retirement benevolent fund RM 531,338 8. Education, welfare, scholarships & others RM 298,841 9. Bus subsidy for school children RM 206,377 10. External donations RM 127,359 Other example sighted: Approval for UPM student to visit the mill includes biogas plant and obtain information for PHD science project dated 11.01.2016.	Yes
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and	United Plantation Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/8/2017. The policy was communicated to all the employees through training, briefing and displayed at notice board in several designated location in	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>multi-lingual version (English, Bahasa Malaysia, Bengali, Hindi and Nepal).</p> <p>UIE Mill has established Safety and Health Plan. Sighted the implementation of the plan as follows:</p> <p>i. Audiometric Testing: The last audiometric was done on 18th March 2019 for total of 118 employees by Earwright Services & Consultants. From the report dated 11/3/2019, there were 1 Standard Threshold Shift (STS) case for workers BK0001476 recorded. Retest for STS was done on 8/6/2019 by Pantai Hospital Manjung (ENT). The report dated 8/6/2019 was sighted. Hearing conservation training been done by management on 31 May 2019 by Chemviro Enterprise.</p> <p>ii. LEV Inspection Periodical inspection, examination and testing of LEV system was done on 9/3/2019 for 2 units of LEV by CSK Murni Services Sdn Bhd (JKKP HIE 127/171-2(1)). Monthly inspection for 2 units of LEV was last done on 15/5/2019.</p>	
<p>4.4.4.2 The occupational safety and health plan should cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risk of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <p>i. All employees involved are adequately trained on safe working practices;</p>	<p>United Plantation Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/8/2017. The policy was communicated to all the employees through training, briefing and displayed at notice board in several designated location in multi-lingual version (English, Bahasa Malaysia, Bengali, Hindi and Nepal).</p> <p>The mill has conducted risk assessment for all main and support operations in the mill and documented in the HIRARC register. The HIRARC was reviewed and minimum of once a year or if accident</p>	<p>Yes</p>

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<ul style="list-style-type: none"> ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 	<p>occurred. Latest review was conducted on 11/2/2019 for accident happen on Jan 2019.</p> <p>The mill established training program for all type of work includes the employee exposed to chemical. The training was conducted by the Manager, Asst. Manager, Executives or Chemical Supplier with knowledge in the chemicals handling. Sighted the training records as follows:</p> <ul style="list-style-type: none"> i. Schedule Waste handling training dated 24/4/2019 ii. Chemical safety handling training dated 24/1/2019 <p>Records were available of PPE issued to individual workers and contractors, including signatures to confirm receipt. PPE standard is based on CHRA assessor's recommendation, SOP and HIRARC.</p> <p>The mill has established Safety and Health committee led by the Mill Manager as Chairman. The chairman has appointed the safety and health committee consist of management and employee representatives. The committee conducted the meetings on quarterly basis to discuss issues regarding safety and health. Latest meeting was conducted on 10/5/2019 and 8/2/2019.</p> <p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency Response Team incorporated under OSH organization chart for 2019. Workers trained in firefighting, rescue method and prepared for the any unforeseen circumstances. Latest fire drill was carried out on 20/3/2019.</p> <p>First aid box were available at few stations in the mill. Noted during interview with the workers shows awareness on the locations and</p>	

Criterion / Indicator	Assessment Findings	Compliance	
i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance -	basic first aid treatment. Latest first aid training was conducted on 27/4/2019. The mill maintain all accident records in JKKP form 6, 7 and 8. Records on Lost Time Accident (LTA) metrics was maintained and based on JKKP 6, 7 & 8. JJKP 8 for was submitted to DOSH on annually basis. All accident cases was reviewed during OSH Committee meeting conducted on quarterly basis.		
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	UIE POM implemented their Human Rights Policy, signed by Dato' Carl Bek-Nielsen on 18.8.17. The management is treated the workers with respect and dignity. Awareness training on human rights policy has been conducted on 26/03/2019 to all 132 workers.	Yes
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Migrant workers are recruited with 3 years contract except for Indonesian workers where the contract is for 2 years. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electric supplier (connect to national water and electricity supply) and medical care are given to all employees without discrimination.	Yes
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements.	All the workers are under direct employment. The pay slip has included basic income, allowance pay, working days, medical leave, and deduction of salary and others as per employment contract.	Yes

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<p>The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>The payroll for the following sampled workers for January, May and May 2019 were verified to be consistent with the Minimum Wages Order 2018.</p> <p>Sampled workers seen as below:</p> <ul style="list-style-type: none"> a. Mill worker ID (Malaysian): 408891 b. Mill worker ID (Nepalese): 414854 c. Mill worker ID (Indonesian): 415671 d. Mill worker ID (Bangladesh): 118349 e. Mill worker ID (India): 307260 f. Mill worker ID (Malaysian): 413381 <p>There was no records or complaint observed during the interview with workers. All the sampled workers for direct employment and contract workers were achieved the minimum wage accordance to Minimum Wage Order 2018 which achieved RM 1100/ month or RM 42.30/day.</p>	
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>There is no contract worker in the mill. All workers are directly hired to work under UIE.</p>	<p>N/A</p>
<p>4.4.5.5 The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain</p>	<p>The workers master list was reviewed. The list includes date of birth, date joined, gender etc.</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>		
<p>4.4.5.6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The following contracts has been verified to confirm that workers have binding working agreement with the company:</p> <ul style="list-style-type: none"> a. Mill worker ID (Malaysian): 408891 b. Mill worker ID (Nepalese): 414854 c. Mill worker ID (Indonesian): 415671 d. Mill worker ID (Bangladesh): 118349 e. Mill worker ID (India): 307260 f. Mill worker ID (Malaysian): 413381 <p>Interview with the workers confirms that they have a copy of the employment contract and they understood the conditions stated in the contract.</p>	<p>Yes</p>
<p>4.4.5.7 The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>There is face recognition for UIE POM to records the accurate working hours and overtime and recorded in UIE TMS Master Report.</p> <p>Verified the overtime and working hours:</p> <ul style="list-style-type: none"> a. Mill worker ID (Malaysian): 408891 b. Mill worker ID (Nepalese): 414854 c. Mill worker ID (Indonesian): 415671 	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>d. Mill worker ID (Bangladesh): 118349</p> <p>e. Mill worker ID (India): 307260</p> <p>f. Mill worker ID (Malaysian): 413381</p> <p>The terms of employment is as per MAPA/NUPW.</p>	
<p>4.4.5.8</p>	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>Yes</p>
<p>4.4.5.9</p>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Yes</p>
<p>4.4.5.10</p>	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p>	<p>The company provides free medical benefit to worker's dependent at the estates clinics.</p> <p>As seen in Annual Report 2018 book, for the whole group, United Plantation has the actual amount as below:</p> <ul style="list-style-type: none"> 6. Hospital & medicine for employees, dependents and nearby communities RM 2,424,918 7. Retirement benevolent fund RM 531,338 8. Education, welfare, scholarships & others RM 298,841 9. Bus subsidy for school children RM 206,377

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		10. External donations RM 127,359	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The basic amenities and facilities at the quarters provided by the company to its workers include electricity, water and domestic waste disposal. Electricity and water is provided by government. Usage of electricity and water given with subsidize rate for the worker's contract. During the linesite visit, it was observed that the housing is in good conditions. New houses were built with spacious and convenient for workers. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 6 people with 3 bedrooms with 2 toilets per house. Linesite inspection was conducted in weekly basis by Hospital Assistant in both mill and estate.	Yes
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Gender Policy signed by Dato Carl Bek-Nielsen, dated 24.4.15 mentioned that the company endeavour to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work.	Yes
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.	During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union but in UIE, the workers have form internal worker's union. The latest minutes of meeting of guest worker's committee is sighted dated 22.05.19 and attended by 8 workers.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	The Human Rights Policy was established on 18.08.2017 signed by Dato Carl Bek-Nielsen. The Policy covers the commitment to not condone forced labour or child labour who under 16 years old.	Yes
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The mill has established training program for all management, employee and contractors as per training need analysis conducted. The training records has been maintained and available for review. Sighted the training records as follows: i. Hearing conservation training dated 30/5/2019 ii. Safety for operator training dated 8/1/2019 iii. Policy on MSPO, RSPO, Human Right Policy, Environment & Biodiversity and UP code of conduct training dated 26/3/2019	Yes
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The mill has conducted training need analysis to identify the training required for each workers. The analysis was conducted base on job designation and type of training required.	Yes
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function	The mill reviewed the training need analysis and program on annually basis to ensure the continuous training for all workers.	Yes

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	and responsibility in accordance to the documented training procedure. - Minor compliance -	Training program and records was maintained and available for review.	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	United Plantations Berhad (UPB) has established a public policy on environmental and biodiversity. The policy incorporated the element of no deforestation. The latest version of policy dated 18/8/2017 was signed by UPB's Chief Executive Director, Dato' Carl Bek-Nielsen.	Yes
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The mill conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment. The analysis was reviewed on annually basis. Latest review was conducted on 25/3/2019 by the Social and Environmental Committee and summarize in the Review Plan - Environmental Risk Assessment 2019. Base on the Environmental Risk Assessment conducted, the mill has established Environmental Action Plan. The plan stated the Workstation/Issue, person responsible, targeted date, resource and status.	Yes
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.	The mill has established Environmental Action plan base on the Environmental Risk Assessment conducted. The Action plan was reviewed on annually basis.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Sighted the implementation of the management plan as follows: i. Sighted the vehicle maintenance records for all machine and vehicle. It was documented in the form '250 – 1000 hours service schedule for tractors/vehicle/machineries'. The records were available at the workshop office for review. ii. Scheduled waste inventory was recorded in Scheduled Waste Log Book before submitted to DOE through E-SWISS Fifth Schedule.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The continual improvement plan towards recycling of waste was sighted. Among program that has been implemented: 11. Zero Burn Replanting Policy 12. Empty Fruit Bunch Use by Estates 13. POME USE – by the Estate 14. Empty Fertilizer Bags Utilization 15. Scrap Metal Sold – UIE Estates 16. Spent Batteries/Dispatches to Waste Manager 17. Spent Lubricants/Dispatches to Waste Manager 18. Spent Fuel Filters/Dispatched to Waste Manager 19. Triple Rinse Pesticide Containers sent to Waste Manager 20. Clinical and Domestic Waste Disposal	Yes
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards	The mill has established training programs that covered aspects of the MSPO & RSPO requirements, with regular assessments of training needs. The training on RSPO & MSPO awareness included	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	achieving objectives. - Major compliance -	on the policy and objectives of the environmental management and improvement plans.	
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The management conducted meeting to discuss the environmental quality ion annually basis. Sighted the latest minutes meeting of UP Group Sustainability Committee conducted on 17/4/2019.	Yes
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The monitoring of non-renewable energy usage was conducted on monthly basis. Average diesel usage FY 2018 recorded at total of 105.028 Liter and 0.489 ton/FFB processed.	Yes
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of nonrenewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Yes
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Renewable energy used is from biofuel (shell and fiber) for boiler start-up. The use of renewable energy was from the methane capturing @ biogas plant. The biogas plant generates electricity to	Yes

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Criterion / Indicator		Assessment Findings	Compliance								
		<p>supply to the national grid has helped the UIE POM to improve the efficiency of fossil fuel consumption.</p> <p>Sighted the records of Renewable Energy Used, GJ per ton CPO as FY 2018 follows:</p> <table border="1"> <thead> <tr> <th>By Product</th> <th>Renewable Energy Used, GJ per ton CPO</th> </tr> </thead> <tbody> <tr> <td>Fibre</td> <td>6.43</td> </tr> <tr> <td>Shell</td> <td>5.34</td> </tr> <tr> <td>Biogas</td> <td>1832.96</td> </tr> </tbody> </table>	By Product	Renewable Energy Used, GJ per ton CPO	Fibre	6.43	Shell	5.34	Biogas	1832.96	
By Product	Renewable Energy Used, GJ per ton CPO										
Fibre	6.43										
Shell	5.34										
Biogas	1832.96										
Criterion 4.5.3: Waste management and disposal											
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>The mill had identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows:</p> <p>i. Domestic waste – rubbish from the mill complex and employees quarters (disposed by estate management).</p> <p>ii. Recycled waste – Fibre, palm kernel shell, boiler ash, scrap iron</p>	Yes								

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Criterion / Indicator		Assessment Findings	Compliance
		iii. Scheduled waste – Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <p>- Major compliance -</p>	<p>The mill has established waste management plan base on the waste identified and documented in Types of Waste Products and Method of Disposal, Action Plan to Reduce Waste. Sighted the implementation of the management plan as follows:</p> <ul style="list-style-type: none"> i. Scheduled waste inventory was recorded in Scheduled Waste Log Book before submitted to DOE through E-SWISS Fifth Schedule. ii. Fiber and Kernel were used as boiler fuel. iii. EFB were disposed by land application at the sister estate. Sighted the records of EFB disposal FY 2018 at 49393 ton for 593 ha. 	Yes
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>The estate and mill has established flow chart for Scheduled Waste Handling for all scheduled waste generated such as SW 102, SW 305, SW 410, SW 409 and SW 404. The SW handling as per regulation.</p> <p>The mill also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Observed during workers interview with storekeeper shows the understanding the proper disposal for waste as all used lubricant</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>and contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area.</p> <p>Sighted the disposal records for SW generated as follows:</p> <ul style="list-style-type: none"> i. 1/6/2019 for SW 409; C/N no: 20190601124NMYTG ii. 1/6/2019 for SW 110; C/N no: 2019060112JVVIA5 iii. 29/5/2019 for SW 306; C/N no: 20190530013YT7SA0 iv. 29/5/2019 for SW 305; C/N no: 20190530013YF24B0 v. 5/3/2019 for SW 306; C/N no: 2019030517W4J32H vi. 5/3/2019 for SW 410; C/N no: 2019030517ES20GA vii. 5/3/2019 for SW 409; C/N no: 2019030517RJ0AMD 	
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	<p>Disposal of domestic wastes through landfilling. Recyclable waste disposed through 3rd party contractor.</p>	Yes
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The mill conducted assessment on all polluting activities during aspects and impacts analysis and documented in the Environmental Risk Assessment. The analysis was reviewed on annually basis. Latest review was conducted on 25/3/2019.</p>	Yes
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p>	<p>Action plan to reduce significant pollutants and emissions were been established and implemented. For example, for GHG emission</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<p>reduction plan, FIT project has started since 21st November 2016 for generation of green energy.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>i. Observed the stack emission monitoring conducted twice a year and submitted Dept. of Environmental as follows:</p> <p>1st half 2018</p> <ul style="list-style-type: none"> - Report no.: MURNI/0318/3175 - Report date: 22/3/2018 - Result: 94 mg/m³ (B1) and 148 mg/m³ (B3) @ dry@ 12% CO₂ <p>2nd half 2018</p> <ul style="list-style-type: none"> - Report no.: MURNI/1118/3546 - Report date: 19/11/2018 - Result: 85 mg/m³ (B1) and 174 mg/m³ (B3) @ dry@ 12% CO₂ 	
<p>4.5.4.3 Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>Effluent generated were disposed through land application as prescribed under "Jadual Pematuhan" no. 004239.</p> <p>Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance.</p> <p>Noted the following 1st quarter report submitted to DOE as follows:</p> <p>1st quater</p>	<p>Yes</p>

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Criterion / Indicator		Assessment Findings				Compliance
			Month	Parameter	Results	
			Jan	BOD	77	
				pH	8.2	
				S. Solid	232	
				Discharge	634	
			Feb	BOD	123	
				pH	8.20	
				S. Solid	305	
				Discharge	746	
			Mar	BOD	54	
				pH	7.90	
				S. Solid	865	
				Discharge	650	

Criterion / Indicator	Assessment Findings	Compliance																				
Criterion 4.5.5: Natural water resources																						
<p>4.5.5.1 The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The mill has established and documented the water management plan. Sighted the implementation of the water management plan as follows:</p> <p>The monitor the water consumption on monthly basis. Sighted the water consumption monitoring records FY 2018 as follows:</p> <table border="1" data-bbox="1088 703 1552 1393"> <thead> <tr> <th>Month</th> <th>Water Consumption</th> </tr> </thead> <tbody> <tr><td>Jan 18</td><td>1.42</td></tr> <tr><td>Feb 18</td><td>1.52</td></tr> <tr><td>Mar 18</td><td>1.33</td></tr> <tr><td>Apr 18</td><td>1.46</td></tr> <tr><td>May 18</td><td>1.33</td></tr> <tr><td>Jun 18</td><td>1.68</td></tr> <tr><td>July 18</td><td>1.54</td></tr> <tr><td>Aug 18</td><td>1.56</td></tr> <tr><td>Sep 18</td><td>1.42</td></tr> </tbody> </table>	Month	Water Consumption	Jan 18	1.42	Feb 18	1.52	Mar 18	1.33	Apr 18	1.46	May 18	1.33	Jun 18	1.68	July 18	1.54	Aug 18	1.56	Sep 18	1.42	<p>Yes</p>
Month	Water Consumption																					
Jan 18	1.42																					
Feb 18	1.52																					
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May 18	1.33																					
Jun 18	1.68																					
July 18	1.54																					
Aug 18	1.56																					
Sep 18	1.42																					

Criterion / Indicator		Assessment Findings				Compliance										
		Oct 18	1.39													
		Nov 18	1.48													
		Dec 18	1.48													
		Average	1.46													
		<p>River water sampling were conducted once a year. Latest sampling was conducted on 19/11/2018. The water sampling result as follows:</p> <table border="1"> <thead> <tr> <th>Sampling Point</th> <th>Bruas River Inlet</th> <th>Bruas River Outlet</th> <th>Sg. Anak Machang Inlet</th> <th>Sg. Anak Machang Outlet</th> </tr> </thead> <tbody> <tr> <td>Water Quality Class</td> <td>III</td> <td>III</td> <td>III</td> <td>IV</td> </tr> </tbody> </table>				Sampling Point	Bruas River Inlet	Bruas River Outlet	Sg. Anak Machang Inlet	Sg. Anak Machang Outlet	Water Quality Class	III	III	III	IV	
Sampling Point	Bruas River Inlet	Bruas River Outlet	Sg. Anak Machang Inlet	Sg. Anak Machang Outlet												
Water Quality Class	III	III	III	IV												
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Effluent generated were disposed through land application as prescribed under "Jadual Pematuhan" no. 004239.</p> <p>Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance.</p>				Yes										



Criterion / Indicator	Assessment Findings	Compliance	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	UIE Palm Oil Mill had maintained Standard Operating Procedure, dated 22/2/2017. Sample SOP as follow: 1. Reception Station, Section 2A 2. Fruit Handling, Section 2B 3. Sterilization, Section 3 4. Threshing, Section 4 5. Empty Bunch Press, Section 5 6. Digestion and pressing, Section 6 7. Clarification, Section 7 8. Kernel Extraction, Section 8 9. Effluent Treatment & Waste Management, Section 12	Yes
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The monitoring of the mill process is made through the shift supervision headed by an Engineer. All process parameters are documented and summarized in a daily report. The CED visited the operating units on timely basis. Their reports covers on all aspect of operation. Latest CED visit conducted on 30/1/2019 – 2/2/2019.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	UIE POM has established and implemented its commitment to long term sustainability and improvements through a capital expenditure program. Budget and 3 years projected management plan (2019-2021) was verified during the audit.	Yes
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	FFB supplier mainly from UIE Estate, which is own estate. For contractor, sighted contract for Foh Hak Engineering Work for desilt lagoon pond, MOA receipt no: A3115 dated 10.12.2018.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	This requirement is in compliance. All contracts and purchases are documented i.e: in the form of purchase orders, invoices, and contracts for the larger transaction. All documents are signed by both vendor and mill. Sample of contract sighted for Foh Hak Engineering Work for desilt lagoon pond, MOA receipt no: A3115 dated 10.12.2018. All contracts terms and conditions were made transparent and agreed from both parties.	Yes
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	UIE Oil Mill had informed its contractors regarding the need to follow the MSPO requirements through MSPO training on 17.05.18. The training was attended by 55 contractors, which Mr Lee Foh Hak attended the Stakeholder’s Meeting on 07.05.2018 and received the Stakeholder Booklet, UIE POM 2019.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with the contractors were verified. Seen also the payment for Foh Hak Engineering Works No: 628030631 for RM 21,000 dated 31.12.2018.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors are being mentioned in the MSPO Policy signed on 29 March 2018 by Dato Carl Bek-Nielson.	Yes

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment United Plantation Berhad-UIE POM Certification Unit complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 Part 4: General principles for palm oil mills. It is recommended that the certification of United Plantation Berhad-UIE POM, Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Cheriachangel Mathews	Name: Muhammad Fadzli Masran
Company name: United Plantations Berhad	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Group Manager, HRESH	Title: Client Manager
Signature:  Date: 5/9/2019	Signature:  Date: 3/9/2019

Appendix A: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	MFM	EOC	
Monday 10/6/2019	PM	Audit Team Travelling	√	√	
Tuesday 11/6/2019 UIE POM	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√	
	09.00 – 12.00	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	
	10.00 – 12.00	Stakeholder interviews (combined with estate’s stakeholders)	-	√	
	12.00 – 13.00	Lunch	√	√	
	13.00 – 16.30		Continue with document review (MSPO part 4), P1: Management commitment and responsibility, P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition	√	√
			P5: Environment, natural resources, biodiversity and ecosystem services P4: Social responsibility, health safety and employment condition, P6 : Best practices	√	√
16.30 - 17.00	Interim Closing briefing.	√	√		
Wednesday 12/6/2019 UIE Estate	09.00 – 12.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	
	12.00 – 13.00	Lunch	√	√	
	13.00 – 16.30	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any)	√	√	
	16.30 - 17.00	Interim Closing briefing.	√	√	

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Thursday 13/6/2019 UIE POM	8.30 – 11.30	<ul style="list-style-type: none"> • Requirements for Supply Chain Management System: 5.1 Sustainability Policy 5.2 Management Representative 5.3 Record Keeping 5.4 Procedures 5.5 Internal Audit 5.6 Management Review • Resource Management: 6.1 Competency and Training • Traceability • Supply Chain Models: 8.1 Segregation 8.1.1 General 8.1.2 Requirements • Outsourced Activities • Claim • Complaints and Grievances • IT Platform 	√	√
	11.30 – 12.00	Preparation of audit report	√	√
	12.00- 13.00	Closing Meeting	√	√

Appendix B: List of Stakeholders Contacted

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Estate managers Mill engineer Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Estate Hospital Assistant</p>	<p>Union/Contractors/Local Communities</p> <p>KJ Fatt Enterprise Pragesh RD Enterprise Ten Crown Enterprise Kg. Sg. Batu</p>
<p>Government Departments</p> <p>SJK(T) Ladang Jenderata</p>	<p>NGO</p>

Appendix C: Smallholder Member Details

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	NA			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
TOTAL				

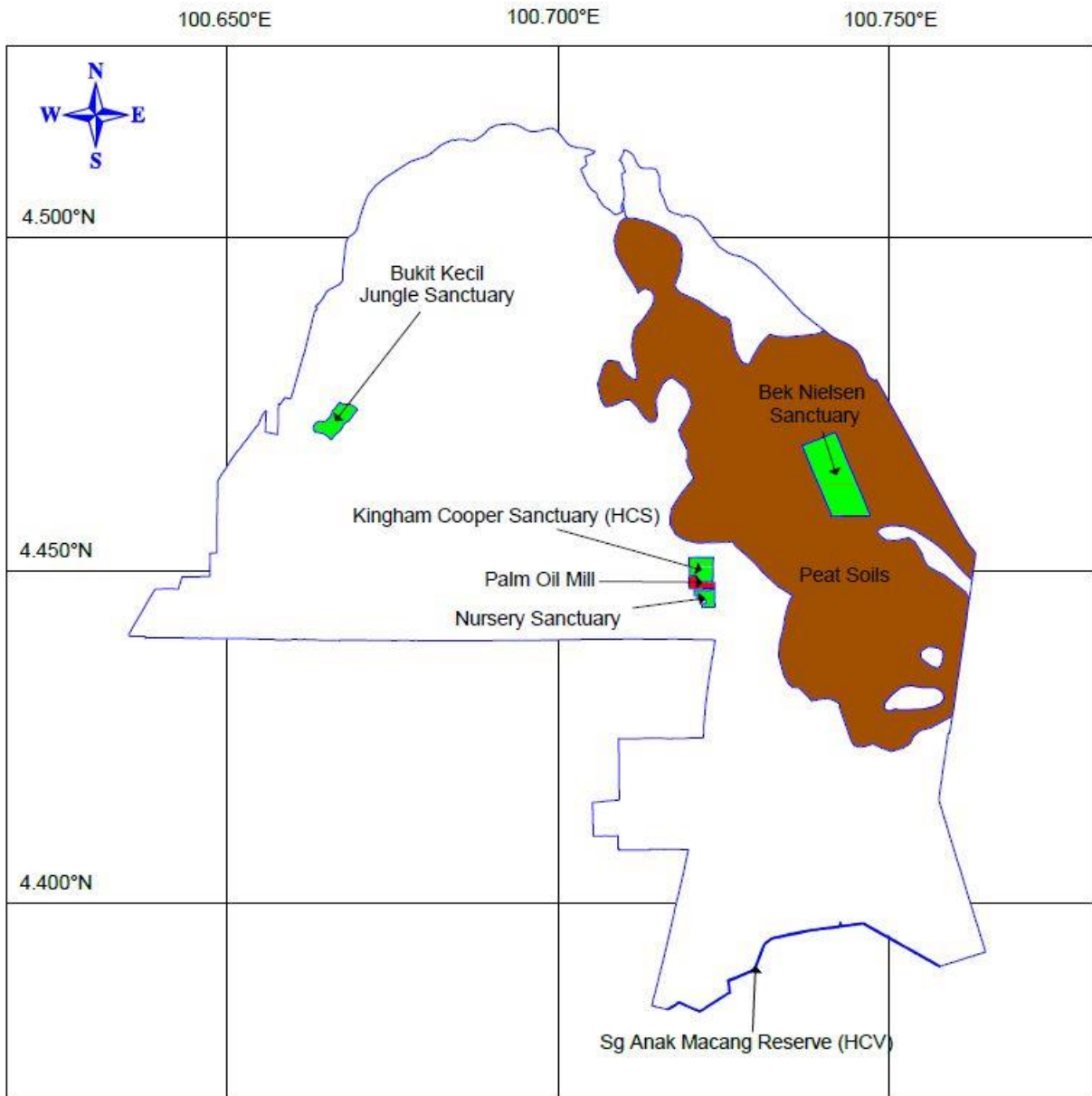
Appendix F: Location and Field Map



UIE Palm Oil Mill Location Map



United Plantations Berhad
UIE Estates



Appendix G: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure