

**MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

UNITED PLANTATIONS BERHAD
Client Company (HQ) Address: Jalan Kuala Selangor - Teluk Intan Jendarata Estate 36009 Teluk Intan Perak, Malaysia
Certification Unit: United International Enterprise (UIE) - UIE Palm Oil Mill and UIE Estate
Date of Final Report: 10/8/2022

Report prepared by:
Mohamed Hidhir Bin Zainal Abidin (Lead Auditor)

Report Number: 3511514

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
(DSM Accreditation Number: MSPO 09112018 CB 12)
Suite 29.01 Level 29 The Gardens North Tower,
Mid Valley City Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia
Tel +60392129638 Fax +60392129639
www.bsigroup.com

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	United Plantations Berhad		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	UIE Palm Oil Mill	500124504000	31/01/2023
	UIE Estate	502076202000	31/07/2023
Address	Jalan Kuala Selangor - Teluk Intan Jendarata Estate, 36009 Teluk Intan, Perak, Malaysia		
Management Representative	Lee Kian Wei		
Website	https://unitedplantations.com	E-mail	lkw@unitedplantations.com
Telephone	05-6436271	Facsimile	05-6417100

1.2 Certification Information			
Certificate Number	Mill: MSPO 693205 Estate: MSPO 693206	Certificate Start Date	28/09/2018
Date of First Certification	28/09/2018	Certificate Expiry Date	27/09/2023
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	20 - 21/6/2018		
Continuous Assessment Visit Date (CAV) 1	11 - 13/6/2019		
Continuous Assessment Visit Date (CAV) 2	02 - 03/9/2020		
Continuous Assessment Visit Date (CAV) 3	21 - 22/09/2021: Remote Audit		
Continuous Assessment Visit Date (CAV) 4	30/5 - 2/6/2022		

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1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 693198	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	28/09/2022
MSPO 709995	MSPO Supply Chain Certification Standard (MSPO SCCS) 1/10/2018	BSI Services Malaysia Sdn Bhd	11/07/2024

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

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
UIE Estate	8,949.56	140.67	1,274.97	10,365.20	86.34
Total (ha)	8,949.56	140.67	1,274.97	10,365.20	

Note: Reduction 4 ha from total area is due to latest re-survey by UPRD team

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
UIE Estate	0	6,474.55	2,475.01	0	0	8,949.56	0
Total (ha)	0	6,474.55	2,475.01	0	0	8,949.56	0

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Sep 21 - Aug 22)	Actual (Sep 21 - May 22)	Forecast (Sep 22 - Aug 23)
UIE Estate	282,000.00	192,738.52	290,000.00

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Total (mt)	282,000.00	192,738.52	290,000.00
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1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Sep 21 - Aug 22)	Actual (Sep 21 - May 22)	Forecast (Sep 22 - Aug 23)
N/A	N/A	N/A	N/A
Total (mt)	N/A	N/A	N/A

1.9 Certified Tonnage			
Mill Capacity: 60 MT/hr SCC Model: SG	Estimated (Sep 21 - Aug 22)	Actual (Sep 21 - May 22)	Forecast (Sep 22 - Aug 23)
	FFB	FFB	FFB
	282,000.00	192,738.52	290,000.00
	CPO (OER: 23 %)	CPO (OER: 22.07%)	CPO (OER: 23 %)
	64,860.00	42,546.18	66,700.00
	PK (KER: 4.5 %)	PK (KER: 4.55%)	PK (KER: 4.8 %)
	12,690.00	8,775.34	13,920.00

1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
42,546.18	0	0	23,149.90	19,200.30	42,350.20

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
8,775.34	0	0	3,129.25	5,546.09	8,675.34

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 30/5 -2/6/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the UIE Palm Oil Mill and UIE Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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

The Certification Unit were using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

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

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

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

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

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

Tentative Date of Next Visit: May 29, 2023 - June 1, 2023

Total No. of Mandays: 7

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohd Hidhir Zainal Abidin (MHZ)	Team Leader	<p>Education: Bachelor’s Degree in Chemical Engineering, National University of Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO since 2012 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit: Social elements, employment conditions, worker welfare, pay and contract, Workers and stakeholder consultation.</p> <p>Language proficiency: English and Bahasa Malaysia</p>

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Nor Halis Abu Zar (NHA)	Team Member	<p>Education: Bachelor of Science, Plantation Technology and Management, Universiti Teknologi Mara</p> <p>Work Experience: 1) 6 years working experience in palm oil industry 2) Auditor for several standards including MSPO and RSPO since 2019</p> <p>Training attended: 1) ISO 9001 Lead Auditor Course in January 2019 2) 14001 Lead Auditor Course in January 2019 3) MSPO 2530:2013 Lead Auditor Course in February 2019 4) RSPO Lead Auditor Course in October 2020 5) SMETA Auditor training</p> <p>Aspect covered in this audit: Legal requirements, mill and estate best practices, safety and health natural and HCV conservation, water & wastes management, environmental aspects, training, and continuous improvement plan</p> <p>Language proficiency: English and Bahasa Malaysia</p>
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2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

No.	Name	Role
1	Faridah Shahidin	Department Standard Malaysia (DSM) – witness assessor/accreditation personnel
2	Nor Faizah Azizan	BSI Services Malaysia Sdn Bhd – observer

2.4 Assessment Plan

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

PRELIMINARY AGENDA				
Date	Time	Subjects	MHZ	NHA
Sunday, 29/05/2022	PM	Audit team travel to Manjung. Hotel check in at Double Happiness Hotel, Manjung	√	√

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Date	Time	Subjects	MHZ	NHA
Monday, 30/05/2022 UIE Estate	0730	Audit team travel to UIE business unit	√	√
	08.30 - 09.00	Opening Meeting – confirmation of audit scope and audit process. <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit Plan Verification of previous audit finding 		
	09.00 - 12.30	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.	√	√
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.30	Continue with unfinished elements. Document review: P1 – P6 (MSPO part 3), P1: Management and responsibility, P2: Transparency, P3: 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	Audit team discussion and interim closing	√	√
Tuesday, 31/05/22 UIE Estate	07.30	Audit team travel to UIE business unit	√	√
	09.00 - 12.00	Continue with unfinished elements from day 1 Document review: P1 – P6 (MSPO part 3), P1: Management and responsibility, P2: Transparency, P3: 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)		
	10.00 - 12.30	Stakeholder consultation – internal and external stakeholders for UIE business unit	√	-
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.30	Continue with unfinished elements	√	√
	16.30 - 17.00	Audit team discussion and interim closing	√	√

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Date	Time	Subjects	MHZ	NHA
Wednesday, 1/6/2022 UIE Palm Oil Mill	0730	Audit team travel to UIE business unit	√	√
	09.00 - 12.30	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.		
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.00	(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	√	√
	16.00 - 16.30	Audit team discussion and interim closing	√	√
Thursday, 2/6/2022 UIE Palm Oil Mill	07.30	Audit team travel to UIE business unit	√	√
	09.00 - 12.30	Continue with unfinished elements		
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.00	MSPO SCCS audit	√	√
	16.00 - 16.30	Audit team discussion	√	√
	16.00 - 16.30	Closing meeting and presentation of finding	√	√

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were 0 (zero) Major & 1 (one) Minor nonconformities and 4 (four) OFI raised. The UIE Palm Oil Mill and estate unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The below is the summary of the non-conformity raised during this assessment

Non-Conformity Report			
NCR Ref #:	2206451-202205-N1	Issue Date:	2/6/2022
Due Date:	Next assessment	Date of Closure:	-
Area/Process:	UIE Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.11 Minor
Requirements:	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 Normative reference: Section 23 – Weekly inspection of employees' housing		
Statement of Nonconformity:	Compliance with Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) was not effectively demonstrated		
Objective Evidence:	Observed during site visit at terrace housing (100 units) at house E4: i) Modification of ceiling fan wiring was made by the occupant. Based on interview he acknowledged that the wiring was modified by himself not by the licensed wireman/electrician. ii) Working tools such as motorized cutter @ CANTAS were kept in the house. Fuel @ petrol was also found in the house in white jerry can.		

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Corrections:	<ol style="list-style-type: none"> 1. The checklist for worker quarters inspection has been revised and circulated to all business units in UP Group. 2. The Estates Director has briefed the UIE team on immediate attention to heightened the worker quarter inspection for interior and exterior of worker houses. 3. The HRSS Department has re-submitted the proposal to the Chief Executive Director on the installation of ceiling fan in worker quarters.
Root cause analysis:	The monitoring of illegal wiring, petrol and working tools storage in the house was not specified in the existing checklist for worker quarters inspection.
Corrective Actions:	The sustainability team will monitor and ensure all Hospital Assistants and estate management utilize the latest checklist for worker quarters inspection.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity For Improvement			
Ref:	2206451-202205-I1	Clause:	MSPO 2530 Part 3: 4.4.4.2 (i)
Area/Process:	UIE Estate		
Objective Evidence:	The monitoring of inventory for first aid box contents and awareness on first aider can be further improved by ensuring that effectiveness of the training given.		

Opportunity For Improvement			
Ref:	2206451-202205-I2	Clause:	MSPO 2530 Part 3: 4.5.3.5
Area/Process:	UIE Estate		
Objective Evidence:	Management could further improve on segregation at source for Domestic waste, source from household or workstation in order for minimizing the contamination of environment from undegradable of waste.		

Opportunity For Improvement			
Ref:	2206451-202205-I3	Clause:	MSPO 2530 Part 4: 4.4.4.2 (i)
Area/Process:	UIE Palm Oil Mill		
Objective Evidence:	The monitoring of inventory for first aid box contents and awareness on first aider can be further improved by ensuring that effectiveness of the training given.		

Opportunity For Improvement			
Ref:	2206451-202205-I4	Clause:	MSPO 2530 Part 4: 4.6.1.1
Area/Process:	UIE Palm Oil Mill		
Objective Evidence:	The effective implementation of procedure at skid tank (Diesel) and Water Pump house can be further improved by ensuring monitoring of best management practice in order to make sure all aspects related safety and environment matters were fully implemented.		

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Noteworthy Positive Comments	
1	Good cooperation with the sustainability and management team.
2	Good retrieval of records and documents shown the maturity of system
3	Well maintained rail system for single handling process
4	Best management practice (mill & estate) well demonstrated

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	N/A	Issue Date:	
Due Date:		Date of Closure:	
Area/Process:		Clause & Category: (Major / Minor)	MSPO Part __:
Clause:			
Requirements:			
Statement of Nonconformity:			
Objective Evidence:			
Corrections:			
Root cause analysis:			
Corrective Actions:			
Assessment Conclusion:			
Verification Statement:			

Opportunity For Improvement			
Ref:	2107776-202109-I1	Clause:	MSPO 2530 Part 4: 4.4.5.8
Area/Process:	UIE Palm Oil Mill		
Objective Evidence:	Observed that one (1) isolated case of maximum overtime limit of 104 hours occurred during peak production month @ August 2021. The management has yet to decide on the options of either applying overtime limit extension from JTK or strictly monitor the limit to ensure compliance against Employment (Limitation of Overtime Work) Regulations 1980.		
Verification Statement:	Based on OT summary report in October 2021, January 2022 and March 2022, maximum OT hours recorded at 91.5 hours. UIE Palm Oil Mill continue to ensure no overtime hours in a month exceeded 104 hours.		

Opportunity For Improvement			
Ref:	2107776-202109-I2	Clause:	MSPO 2530 Part 3: 4.4.1.1

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Area/Process:	UIE Estate
Objective Evidence:	Repatriation of guest worker has yet to be included as one of the social impacts in the SIA. Noted that there were a few repatriation requests to the management of UIE Palm Oil Mill and the impact has yet to be evaluated in the next review of SIA for improvement.
Verification Statement:	Repatriation has been identified and included in the SIA management plan. The recent suicide case was also included on the SIA management to ensure no recurrence of the same issue in future.

Opportunity For Improvement			
Ref:	2107776-202109-I3	Clause:	MSPO Part 4: 4.1.2.2
Area/Process:	UIE Palm Oil Mill		
Objective Evidence:	The corrective action plan process can be further improved by ensuring that root cause identified, and corrective action is correctly assigned for implementation.		
Verification Statement:	CAP process (root cause analysis, correction and corrective action) included in the follow-up audit process for improvement.		

Opportunity For Improvement			
Ref:	2107776-202109-I4	Clause:	MSPO 2530 Part 3: 4.1.2.2
Area/Process:	UIE Estate		
Objective Evidence:	The corrective action plan process can be further improved by ensuring that root cause identified, and corrective action is correctly assigned for implementation.		
Verification Statement:	CAP process (root cause analysis, correction and corrective action) included in the follow-up audit process for improvement.		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1648218-201804-M1	4.3.1.1 Part 4 Major	21/6/2018	Closed out on 03/8/2018
1782156-201904-N1	4.3.1.4 Part 4 Minor	12/6/2019	Closed out on 03/9/2020
1782156-201904-N2	4.6.1.1 Part 3 Minor	12/6/2019	Closed out on 03/9/2020
1953411-202009-N1	4.4.4.2 Part 3 Minor	03/9/2020	Closed out on 22/9/2021
1953411-202009-N2	4.4.4.2 Part 4 Minor	03/9/2020	Closed out on 22/9/2021
2206451-202205-N1	4.4.5.11 Part 3 Minor	02/6/2022	"Open"

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Village representatives (JPKK Kg Matang Acheh and Kedah) – There were some feedbacks from the representatives with regards to road access and job vacancy information/advertisement to the villagers. They also not aware who is the person in charge for the estate/mill and process to submit feedback/request/complaint.</p> <p>Management Responses: During last stakeholder meeting in May 2022, all stakeholders were briefed on the grievance and complaint procedure. Person in charge on social matters for UIE estate and mill were introduced as well during meeting. Proactively, a WhatsApp group was created as part of communication medium with the neighbouring stakeholders.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Supermandore/Contractors – They informed that the payment was made promptly. They are aware of the complaint procedure and so far, they have no issue with the management.</p> <p>Management Responses: The management will ensure the payment will be made accordingly.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Issues: Gender Committee Representatives – No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender.</p> <p>Management Responses: The management will continue to monitor if there is any case of sexual harassment or violence.</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Issues: Guest Workers Representative – The workers are satisfied with the management and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure and they can voice out any issues with the management through Guest Workers Meeting. All deduction made in the payslip were made aware by them. No discrimination from the management in terms of job/task offered and treatment to all workers.</p> <p>Management Responses: The management will ensure comply to legal requirements and respect all the workers without discrimination.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Issues:</p>

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	<p>Sundry shop/canteen: Reasonable and affordable fees charged to the tenants and contracted on annual basis. Foods and groceries price have to be displayed and regular inspection by management as to ensure price is affordable to all workers.</p> <p>Management Responses: Will continue to ensure food is readily accessible and affordable to workers.</p> <p>Audit Team Findings: No further issue.</p>
6	<p>Issues: Labour Department: A phone call made with the officer from Sitiawan office, Puan Yusza. A few issues have been discussed with the officer with regards to implementation of Minimum Wages Order 2022 and type of approved deduction in the payslip. UPB has obtained a blanket approval from JTK, ref: (6) dlm BHG PU/9/129 dated 1/6/12 and the permit is remained valid. Deduction such as for cooking oil supplied from UP's own refinery (UNITATA) with subsidize price does not required a specific permit. Minimum Wages of RM1500 per month effective from 1/5/2022 and for a company that employed less than 5 workers, a grace period until 1/1/2023 is given before in compliance with Minimum Wages Order 2022. Previous Minimum Wages Order 2020 is still applied until the cut-off date.</p> <p>Management Responses: Noted on the information shared and will continue to comply with all applicable labour laws.</p> <p>Audit Team Findings: No further information.</p>
7	<p>Issues: Department of Environment: A phone call made with the officer from Teluk Intan office, Puan Hidayah. Based on the records (field citation report), no legal non-compliance issues reported so far. UJE Palm Oil Mill has continued to comply with EQA 1974 specifically stipulated under UJE Palm Oil Mill's compliance schedule.</p> <p>Management Responses: Will continue to comply with all applicable environmental laws and regulation.</p> <p>Audit Team Findings: No further information.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Labour Department, Sitiawan Department of Environment, Teluk Intan</p>	<p>Community/neighbouring village: Kg Matang Aceh Ladang Gelung Pepuyu Kg Kedah</p>
<p>Suppliers/Contractors/Vendors: Sundry shop Canteen Supermandores</p>	<p>Worker's Representative/Gender Committee: Estate workers Mill operators Gender representative</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment UIE Estate and UIE Palm Oil Mill Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of UIE Estate and UIE Palm Oil Mill Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Lee Kian Wei	Name: Mohamed Hidhir Bin Zainal Abidin
Company name: United Plantations Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: Manager, Sustainability	Title: Lead Auditor
Signature: 	Signature: 
Date: 4/07/2022	Date: 3/07/2022

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	United Plantations Berhad has established MSPO policy which signed by Chief Executive Director, Dato’ Carl Bek-Nielsen effective date 29/03/2018. Latest policy briefing was carried out on 15/1/2022 during muster ground by estate’s assistant.	Complied
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	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to	Internal audit process is documented under Internal Audit Procedure,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	determine the strong and weak points and potential area for further improvement. - Major compliance -	dated 15/02/2019, revision 1. Annual audit schedule for 2022 was made available for review. Audit schedule for UIE Palm Oil Mill and its supply bases was from 18-19/4/2022 by pool of trained internal audit from HREHS department. Cross department/mill audit was demonstrated to ensure impartiality of audit.	
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 23/4/2022. 4 NCs for site visit and for documentation audit were raised for UIE Business Unit. The action plan was submitted to Group Manager HR ESH for closure on 6/5/2022. The findings were closed on 24/5/22 based on document review and follow-up on 24/5/22.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Internal audit report and verification report dated 23/4/2022 was made available to the management for review.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The last management review was conducted on 18/05/2022. 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.	Complied
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.	Among continual improvement plan listed in CAPEX for 2022 as per the following:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>Tractors, agricultural, trailers</p> <ol style="list-style-type: none"> Hyvea Grabber (5 units) Tractors (Farmmaster 85 DT tractor (5 units) <p>Infrastructure/Tarmac/Road Resurface</p> <ol style="list-style-type: none"> Tarmac Sungai Batu – UIE Main Road (6000 sq meter) <p>Building and compounds</p> <ol style="list-style-type: none"> 1 unit guest workers barrack 2 units semi-D staff house <p>Mill Plant and Machinery</p> <ol style="list-style-type: none"> P15 screw press c/w digester – process efficiency Roofing shed for EFB storage – DOE license conditions PAPX 307 purifier – oil purifying process 	
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>Provisions were made in the annual and forecast business plans/budgets for the necessary resources including training, to implement the new techniques.</p> <p>New tech – Mechanization on the operation</p> <p>Palmpo – light-weight pole (to increase productivity)</p>	Complied
4.1.4.3	<p>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.</p> <p>- Major compliance -</p>	<p>Action plan detailed out under social and environmental management for FY 2022 as detailed out under 4.1.4.1.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate 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. 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.</p> <p>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>	Complied
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>	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - 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.	Complied
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 who is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Stakeholder’s list for both UIE Palm Oil Mill and UIE 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 for 2022. The latest stakeholder meeting was carried out on 12/5/2022. Stakeholders from the neighbouring villages (Kg Changkat, Kg Sg batu), police department, adjacent estates, school representatives were among that attending the meeting. All feedbacks recorded in the minutes of meeting.	Complied
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 described 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	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Delivery order (DO) indicated the details of: a. Cages number b. DO number	
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 18-19/4/2022 by HRESH team to inspect the compliance with traceability procedure in estate.	Complied
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 who is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Complied
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 Palm Oil Mill and belongs to the United Plantations Berhad. Sampled the weighbridge ticket provided the following FFB dispatch report (estate): FFB dispatch report: 58969 Dispatch date: 15/4/22 Division: 2A Total no. of cages: 25 units Field number: 125, 126A & B Weighbridge ticket summary report no.: 0000158941 Cages no. (068A, 142A, 073A, 022A), filed 125 Total weight: 12.66 mt	Complied
4.3 Principle 3: Compliance to legal requirements			

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Criterion / Indicator		Assessment Findings	Compliance
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 -	<p>UIE Estate continued to ensure compliance towards all applicable local, 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"> 1. MPOB Licence: 5020762000 valid until 31/07/2022 2. Arm Licence Bil. (A) MJG/1132 valid until June 2023 3. KPDHEP No: A001079 for Diesel (Euro 2M) for 50,000 Lit and Petrol (Ron 95) for 16,000 Litre valid until 24/08/2024 4. JTK Permit for Night shift work for female, BHG PU/9/135 Jld 14 (8) dated 19/07/2018 to UPB-UIE. 5. JTK Permit for salary advance, no siri: 0232 to UIE (M) Sdn Bhd dated 30/08/2008 6. JTK Permit for salary deduction as per Employment Act 1955 dated 01/06/2012 	Complied
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	<p>UIE Estate 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.</p> <p>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.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>UIE Estate 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.</p> <p>Monitoring on changes of Law and Regulation has been conducted based on any new amendments or any new regulations coming into force. Refer document tracking changes in law dated 28/04/2022 "Tracking changes in Law" stated on update of Minimum wages order 2022. Previous Tracking Changes on law dated 11/02/2021 update on Interstate Movement & My Travel Pass speech by Prime Minister dated 10/10/2021.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and 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) 	Complied
Criterion 4.3.2 – Lands use rights			

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Criterion / Indicator		Assessment Findings	Compliance												
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 -	Total of 8 land titles (leasehold: 6 titles and freehold: 2 titles) under UIE Estate 1 and 2 with the total area of 10.365.2 ha.	Complied												
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Land titles are available to demonstrate evidence of land leases. The land titles contain information on lessee, hectarage, terms and conditions of lease ("tanaman komersial kepala sawit"), lease period and grant numbers. The following land titles were sampled: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Land title details</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>District: Manjung, Mukim: Pengkalan Baru, grant no. PN 1065883, lot no. 11444 Total hectare: 3,835 ha</td> <td>Agriculture/ Oil Palm</td> <td>Lease hold (lease period from 21/1/93 – 23/12/2103)</td> </tr> <tr> <td>2</td> <td>District: Manjung, Mukim: Pengkalan Baru, grant no. PN 352535, lot no. 10423 Total hectare: 142.80 ha</td> <td>Agriculture/ Oil Palm</td> <td>Lease hold (lease period from 24/10/91 – 23/12/2103)</td> </tr> </tbody> </table>	No.	Land title details	Land use type	Tenure	1	District: Manjung, Mukim: Pengkalan Baru, grant no. PN 1065883, lot no. 11444 Total hectare: 3,835 ha	Agriculture/ Oil Palm	Lease hold (lease period from 21/1/93 – 23/12/2103)	2	District: Manjung, Mukim: Pengkalan Baru, grant no. PN 352535, lot no. 10423 Total hectare: 142.80 ha	Agriculture/ Oil Palm	Lease hold (lease period from 24/10/91 – 23/12/2103)	Complied
No.	Land title details	Land use type	Tenure												
1	District: Manjung, Mukim: Pengkalan Baru, grant no. PN 1065883, lot no. 11444 Total hectare: 3,835 ha	Agriculture/ Oil Palm	Lease hold (lease period from 21/1/93 – 23/12/2103)												
2	District: Manjung, Mukim: Pengkalan Baru, grant no. PN 352535, lot no. 10423 Total hectare: 142.80 ha	Agriculture/ Oil Palm	Lease hold (lease period from 24/10/91 – 23/12/2103)												
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Based on the site visit, the common method of demarcation of boundaries was by putting up concrete pegs that painted with white colour and GPS coordinates information was printed on them. Other than that, boundary trenching method is also used. Verified total of 25 boundary pegs demarcated along UIE estate boundary.	Complied												
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if	Complied												

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Criterion / Indicator		Assessment Findings	Compliance
	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 -	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	
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 -	UIE Estate is operating in legally titled lands which are not encumbered by customary rights. Thus, this indicator is not applicable.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	UIE Estate is operating in legally titled lands which are not encumbered by customary rights. Thus, this indicator is not applicable.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no 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.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The latest review of SIA management plan was conducted in 12/5/22. Key areas identified in the SIA was on access and use rights, economic livelihoods and working conditions, human rights and mill operation.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The recommendation from the SIA report was transferred to action plan (Social) 2021. The action plan identified the issues & strategies, action plan, responsible person and time frame. Suicide cases were reported and captured in the management plan. Action plan identified by the management:</p> <p>1) No restriction of movement by all workers 2) Repatriation subject to availability of flights 3) No penalty on termination of contract prematurely The Social</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>The Standard Operation Procedure documented the process for Procedure for both External & Internal Stakeholders.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>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>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>The 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.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Interview conducted with workers to confirm their understanding of the complaint and grievance process.</p> <p>There is no critical grievance recorded for the pass one year. Only request for maintenance and house repairs are made by workers.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	<p>Management have made contribution to the internal and external stakeholders. As seen in Annual Report 2021 book, for the whole group, United Plantation has the actual amount as below:</p> <ul style="list-style-type: none"> • Hospital & medicine for employees, dependents and nearby communities RM 2,828,114 • Retirement benevolent fund RM 486,202 • Education, welfare, scholarships & others RM 314,887 • Bus subsidy for school children RM 88,312 • External donations RM 307,835 • New infrastructure – road, TNB and water supply for domestic use – RM 197,401 • Employee housing – RM 10,149,666 • New infrastructure project building, community hall and place of worship – 1,963,058 • Provision of social amenities – RM 6,109,270 <p>Total contribution: RM 22,444,745</p>	Complied
Criterion 4.4.4: Employees safety and health			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	United Plantations Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/08/2017. 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). Latest policy briefing has been conducted on 15/01/2022.	Complied
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 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.	a) United Plantations Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/08/2017. 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). Latest policy briefing has been conducted on 15/01/2022. b) 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 occurred. There are 51 operation discussed in the HIRARC. Latest review was conducted on 01/01/2022 with reference number UIE-001. Verified HIRARC of Harvesting, Manuring, Rubbish collection and Grass cutting. CHRA Chemical Health Risk Assessment was conducted in the estate by Chemviro Enterprises on 25/04/2022. The CHRA Report (HQ/13/ASS/00/316-2022/030) was available for verification. Baseline Noise Risk Assessment has been conducted at UIE Estate dated 13/07/2020. Refer report UPUIE2020-19.8 dated 20/08/2020. The NRA Report was available for verification. Audiometric Test has been conducted on 18/02/2022 by Ansonex Resources Group. A total of 58 employees were tested. Result	OFI

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Criterion / Indicator	Assessment Findings	Compliance
<p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>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>indicated that there is no workers fall under Abnormal Audiometric Results which is Hearing Impairment, Possible Standard Threshold Shift</p> <p>Medical surveillance has been conducted as per recommended by CHRA assessor. Estate Hospital Assistant has monitored on chemical handler in monthly basis.</p> <p>c) The estate has 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. Verified the sample training records of Mechanization Maxiboom dated 07/03/2022, Harvesting training dated 13/01/2022 and SW Training on 17/05/2022.</p> <p>d) Records of PPE issuance were available to workers and contractors, including signatures to confirm receipt. PPE standard is based on CHRA assessor's recommendation, SOP and HIRARC. The control of COVID-19 spreading was seen to be implemented which among others include of pre-entry test for visitors, face mask usage, hand sanitizing, regular disinfecting of workplace, and social distancing.</p> <p>e) SOP for handling chemical management was addressed in a few procedures. The procedures outline the handling of chemicals in accordance to the regulation. SDS were place at the chemical and fertilizer store with 2 language which is English and Bahasa. Sample SDS checked were MOP, Urea, Sentry and Antracol. Emergency eye wash were checked and functioned in order. Training has been conducted on 17/05/2022.</p>	

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Criterion / Indicator	Assessment Findings	Compliance												
	<p>f) 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. There is also a safety officer appointed as a person of trust shall have knowledge and access to latest national regulations and collective agreements for UP. Refer OSH Committee 2022/2023 and Appointment letter dated 01/01/2022.</p> <p>g) The committee conducted the meetings on quarterly basis to discuss issues regarding safety and health. Last four meeting were conducted on</p> <table border="1" data-bbox="1111 767 1771 970"> <thead> <tr> <th>OSH Meeting</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1st Meeting 2022</td> <td>21/03/2022</td> </tr> <tr> <td>4th Meeting 2021</td> <td>08/12/2021</td> </tr> <tr> <td>3rd Meeting 2021</td> <td>27/07/2021</td> </tr> <tr> <td>2nd Meeting 2021</td> <td>21/04/2021</td> </tr> <tr> <td>1st Meeting 2021</td> <td>23/02/2021</td> </tr> </tbody> </table> <p>h) Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies. ERP and fire drill training were conducted on 18/05/2022 by BOMBA Pantai Remis Officer.</p> <p>i) First Aid Kits were available at all sampled work units Harvesting Gang, Workshop, Maintenance work (Loose fruit collection) and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished and monitored regularly as per the monitoring checklist by Hospital</p>	OSH Meeting	Date	1 st Meeting 2022	21/03/2022	4 th Meeting 2021	08/12/2021	3 rd Meeting 2021	27/07/2021	2 nd Meeting 2021	21/04/2021	1 st Meeting 2021	23/02/2021	
OSH Meeting	Date													
1 st Meeting 2022	21/03/2022													
4 th Meeting 2021	08/12/2021													
3 rd Meeting 2021	27/07/2021													
2 nd Meeting 2021	21/04/2021													
1 st Meeting 2021	23/02/2021													

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Criterion / Indicator		Assessment Findings	Compliance														
		<p>Assistant. The First Aid Kit holders were aware on how to use the items in case of an emergency. Training of First Aid has been conducted on 14/04/2022. Verified training material, photos and first aider interviewed in the field found attend the training as per attendance evidence.</p> <p>The monitoring of inventory for first aid box contents and awareness on first aider can be further improved by ensuring that effectiveness of the training given. Thus, OFI was raised.</p> <p>j) Accident records were maintained and updated monthly at the estates.</p> <p>There were 3 accidents reported for the year 2021 and 1 accident at 2022 in the estate. The JKKP 8 form have been submitted to DOSH on 06/01/2022 and available for verification (JKKP8/94880/2021). Records of accident investigation were maintained and discussed in the quarterly OSH Meeting. SOCSO record on payment was available for verification</p> <p>Occupational Injuries were recorded using the Lost Time Accident metrics as below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>UIE Estate</td> <td>3</td> <td>159</td> <td>1</td> <td>57</td> </tr> </tbody> </table>	Operating Unit	2021		2022		Cases	Days	Cases	Days	UIE Estate	3	159	1	57	
Operating Unit	2021			2022													
	Cases	Days	Cases	Days													
UIE Estate	3	159	1	57													
Criterion 4.4.5: Employment conditions																	
4.4.5.1	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.	UIE Estate implemented their Human Rights Policy, signed by Dato' Carl Bek-Nielsen on 09/03/2020. The management is treated the workers with respect and dignity. Awareness training on human rights policy has been conducted on 15/1/2022.	Complied														

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>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 kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized rate of water and electric supplier (connect to national water and electricity supply) and medical care are given to all employees without discrimination.</p>	Complied
4.4.5.3	<p>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 latest Collective Agreement referred is MAPA/NUPW POM Employees Agreement 2019.</p> <p>The payroll for the following sampled workers for January 2022 (low crop), February 2022 (normal crop) and October 2022 (peak crop) were verified to be consistent with the Minimum Wages Order 2020. Sample of 21 workers for estate divisions were checked as per the following list:</p> <ol style="list-style-type: none"> 1) Employee ID: 107501 (Nursery) 2) Employee ID: 305080 (2B) 3) Employee ID: 205795 (2B) 4) Employee ID: 306106 (2B) 5) Employee ID: 413380 (2A) 6) Employee ID: 307480 (Rail) 7) Employee ID: 112792 (AP) 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		8) Employee ID: 208022 (Nursery) 9) Employee ID: 123341 (1A) 10) Employee ID: 118284 (1A) 11) Employee ID: 311706 (2B) 12) Employee ID: 309017 (2B) 13) Employee ID: 208857 (S/G) 14) Employee ID: 115115 (1A) 15) Employee ID: 310185 (2B) 16) Employee ID: 311737 (T/P) 17) Employee ID: 118662 (1A) 18) Employee ID: 118820 (1A) 19) Employee ID: 210481 (2A) 20) Employee ID: 310848 (2B) 21) Employee ID: 120124 (1B)	
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. - Minor compliance -	The mechanism to ensure that the contractor’s overtime and working on rest were paid accordingly is by obtaining the pay slip of the workers from the contractor. Based on verification of pay slips of several contractors at all the visited estates, the pay slip for contractor workers has the information about overtime, work on rest day or public holiday, unpaid leave, annual leave, etc. The pay was also found to be in accordance to minimum standards.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The management has maintained lists of employees that recorded the full names, gender, date of birth, date of entry, wage and period of employment.</p> <p>The records in the check-roll form there is monthly overtime report for each worker and other information available in employee register kept in individual file and in the master list.</p>	Complied
4.4.5.6	<p>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 employment contract is available and signed by both employee and employer. All the sampled employment contracts and appointment letters were signed by the employees.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Pocket check roll or punch card is used to record the working days and overtime of all workers. Verification of the check roll confirm that the working days and overtime is tally with the payslips.</p>	Complied
4.4.5.8	<p>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.</p> <p>- Major compliance -</p>	<p>The working hours of the employees and overtime rates are specified in the employment contract e.g. 8 hours per day and overtime rates are in accordance with the Employment Act 1955.</p>	Complied
4.4.5.9	<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>Pay slips clearly showed the basic pay or piece rate, number of days worked or total output, any allowable deductions and net amount.</p> <p>Any overtime, holiday pay, working on rest days or Sundays or Holidays, when applicable, are also shown on the pay slips.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Minor compliance -</p>	<p>The company provides free medical benefit to worker's dependent at the estate's clinics. As seen in Annual Report 2021 book, for the whole group, United Plantations Berhad as reported under indicator 4.4.3.1.</p>	<p>Complied</p>
<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 are provided by government. Usage of electricity and water given with subsidized rate for the worker's contract. Based on linesite inspection record, 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 on weekly basis by Hospital Assistant in both mill and estate. Records line site inspection available for 30/5/2022, 21/5/2022, 14/5/2022, 7/5/2022.</p> <p>Visiting Medical Officer (VMO) visit was done every fortnightly by appointed VMO under Kumpulan Poliklinik Manjung Sdn Bhd. Latest visit in May was carried out on 6/5/2022 and 27/5/2022. Based on the report, no negative comment recorded in the logbook. Other than patient review records, line site cleanliness were also reviewed by the VMO.</p> <p>Observed during site visit at terrace housing (100 units) at house E4:</p> <p>i) Modification of ceiling fan wiring was made by the occupant. Based on interview he acknowledged that the wiring was modified by himself not by the licensed wireman/electrician.</p>	<p>Minor non-conformity</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>ii) Working tools such as motorized cutter @ CANTAS were kept in the house. Fuel @ petrol was also found in the house in white jerry can. Thus, a minor NC was issued.</p> <p>General comments – compound, fogging, drainage, water-logged, building, rubbish collection, canteen, temple and surau etc.</p>	
4.4.5.12	<p>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>A formal gender committee structure established with the members from both UIE estate and mill. As at 2/1/2022, 29 members appointed (staff and workers) and verified via appointment letter which valid for 2 years from 1/1/2021 – 31/12/2022. The latest meeting was carried out on 26/4/2022. No compliant highlighted by committee and no sexual harassment case reported.</p>	Complied
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>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 called guest workers welfare committee.</p> <p>The latest minutes of meeting of guest worker’s committee is sighted dated 20/3/22 and attended by workers for both UIE Palm Oil Mill and UIE Estate. Some of the issue sighted are:</p> <ol style="list-style-type: none"> 1. Request to install convex mirror at field 144 (coconut) for road safety especially vehicle coming from Beruas. Issue: Installed. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>2. Request to management team to allow night market on 10th every month after salary Action: Night market allowed since after MCO</p> <p>3. Request to buy grocery at Pantai Remis town Action: No restriction after MCO</p> <p>Sighted the appointment letter for the committee members from Nepal, Bangladesh, Indonesian and India dated 01/01/2021 valid until 31/12/2022.</p>													
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. 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 and signed by Dato’ Carl Bek-Nielsen on 09/03/2020. The Policy mentioned that United Plantations Berhad will not tolerate the use of child or force labour, slavery or human trafficking in any of their plantations and facilities (anyone who less than 18 years old).</p>	Complied												
Criterion 4.4.6: Training and competency															
4.4.6.1	<p>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>Verified annual training program for the year of 2022. All training has been conducted as per plan. Among sample of training record were verified: -</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Policy Training</td> <td>15/01/2022</td> </tr> <tr> <td>ERP – Fire Drill Training</td> <td>18/05/2022</td> </tr> <tr> <td>First Aid Training</td> <td>14/04/2022</td> </tr> <tr> <td>Road Safety Campaign</td> <td>05/01/2022</td> </tr> <tr> <td>Safety Manuring Operation</td> <td>15/02/2022</td> </tr> </tbody> </table>	Training	Date	Policy Training	15/01/2022	ERP – Fire Drill Training	18/05/2022	First Aid Training	14/04/2022	Road Safety Campaign	05/01/2022	Safety Manuring Operation	15/02/2022	Complied
Training	Date														
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Criterion / Indicator		Assessment Findings		Compliance
		Tractor Pool Fitter Training Safety	11/03/2022	
		Rubbish Pit Training	22/03/2022	
		Driver Training – Tractor & Trailer	10/03/2022	
		Maxiboom sprayer Training	07/03/2022	
		Trunk Injection Training	20/01/2022	
		Safety in Harvesting & Pruning	13/01/2022	
		IPM Operation Training	24/05/2022	
		Safety in chemical spillage	17/05/2022	
		Riparian Awareness Training (HCV)	12/05/2022	
		Schedule Waste Training	17/05/2022	
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>This is addressed by the utilization of the “Training Needs Analysis” form. The objective is to identify the appropriate training to be provided to workers based on their current job function. The analysis is usually done in early year or end of the year and is used to establish the training programme. Among the information available in the form is current job function, skill/knowledge required, present ability, job needed, and training required.</p>		Complied
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>All workers involved in the operations have been adequately trained in safe working practice. The estates have a comprehensive Training Needs Analysis for staffs and workers and this was sighted in the training records file. Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training. Training plan for the year 2022 dated on January was available for verification.</p>		Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	United Plantations Berhad (UPB) has established a public policy on environmental and biodiversity. The policy incorporated the element of no deforestation. The latest version of policy dated 18/08/2017 was signed by UPB's Chief Executive Director, Dato' Carl Bek-Nielsen. Policy training has been conducted on 15/01/2022.	Complied
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 -	Environmental Impact Assessment (EIA) was last reviewed on 12/05/2022. There were 3 main criteria considered in the assessment i.e. severity, quantity/load, probability. From the assessment, the information about the level of environmental risks were then obtained and it was important to determine the action plan thereafter. Sample on EIA checked were Weeding, Manuring, Circle Sanitation, Water management, Upkeep Mature and Immature Oil Palm.	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The estate has established Environmental Action plan based on the Environmental Risk Assessment conducted. The Action plan was reviewed on annual basis. Social and Environmental Impact Assessment (SEIA) has been conducted for internal dated 30/04/2022 and external stakeholders 04/03/2022 to measure and to understand both positive and negative Social and Environmental impacts from estate operation.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Positive impact on environment was identified through the SEIA and environmental risk assessment. Example of positive impact identified and promoted by the estate is reduce usage of chemicals by using mechanical movers in harvesting avenues and road edges.	Complied
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	The estate has established training programs that covered the subjects of the MSPO & RSPO requirements, with regular assessments of training needs. The training on RSPO & MSPO awareness included on	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
	objectives. - Major compliance -	the policy and objectives of the environmental management and improvement plans. Sample of training were: <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Safety in chemical spillage</td> <td>17/05/2022</td> </tr> <tr> <td>Riparian Awareness Training (HCV)</td> <td>12/05/2022</td> </tr> <tr> <td>Schedule Waste Training</td> <td>17/05/2022</td> </tr> </tbody> </table>	Training	Date	Safety in chemical spillage	17/05/2022	Riparian Awareness Training (HCV)	12/05/2022	Schedule Waste Training	17/05/2022					
Training	Date														
Safety in chemical spillage	17/05/2022														
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Schedule Waste Training	17/05/2022														
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Discussion on the concern of workers about the environmental quality was done through meetings, morning muster and stakeholders meeting. Records of attendance were maintained. Environment meeting dated 12/05/2022 was available for verification.	Complied												
Criterion 4.5.2: Efficiency of energy use and use of renewable energy															
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	The monitoring of non-renewable energy usage was done on monthly basis. The fuel consumption record is combined with UIE Estate. Based on the data and plotted graph, the consumption trend seemed to be going downwards for the past 3 years.	Complied												
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 of the direct usage of non-renewable energy for the estate's 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 operating unit annual budgets. <table border="1"> <thead> <tr> <th colspan="4">UIE Estate</th> </tr> <tr> <th>Year</th> <th>FFB</th> <th>Diesel/L</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>284197.87</td> <td>89078</td> <td>0.31</td> </tr> </tbody> </table>	UIE Estate				Year	FFB	Diesel/L	Diesel/FFB	2021	284197.87	89078	0.31	Complied
UIE Estate															
Year	FFB	Diesel/L	Diesel/FFB												
2021	284197.87	89078	0.31												

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Criterion / Indicator		Assessment Findings					Compliance
		2022 TDT	85371.19	32192.00	0.38		
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no opportunity found by the estate on the use of renewable energy so far.					Complied
Criterion 4.5.3: Waste management and disposal							
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The estate had identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. Among the wastes identified were: <ul style="list-style-type: none"> • Domestic waste – rubbish from the estate complex and employees’ quarters • Recyclable wastes – plastic, glass and metal • Scheduled wastes – contaminated oil filter, spent lubricants, spent hydraulic oil, used batteries 					Complied
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: <ol style="list-style-type: none"> Identifying and monitoring sources of waste and pollution Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	The estate has established waste management plan based on the waste identified and documented in Types of Waste Products and Method of Disposal, Action Plan to Reduce Waste. The following implementation of the management plans were verified: <ul style="list-style-type: none"> • Scheduled wastes inventory was recorded in Scheduled Waste Log Book before submitted to DOE through e-SWISS. • Recyclable wastes were segregated and sold to recycle wastes 					Complied
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	The estate has established a flow chart for Scheduled Waste Handling for all scheduled waste generated such as SW102, SW305, SW410, SW409 and SW404 as per regulation. The estate also has a proper					Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>Inventory of schedule waste has been maintained by the UIE Estate. Latest inventory recorded on 15/04/2022 with file reference number AS(B)A11/123/000/135. Waste generated was SW404 Clinical waste 0.01 Mt, SW 409 Used Chemical Drum & Used PPE 0.25 Mt.</p> <p>Latest disposal of SW was available for verification. Sample of consignment notes were:</p> <ol style="list-style-type: none"> 1. Consignment No: 20220427178KJH0G dated 27/04/2022, SW409 Used Chemical Drum & Used PPE 0.55 Mt by EDSHA Solutions Sdn Bhd. 2. Consignment No: 2022041308NKVFCB dated 13/04/2022, SW409 Used Chemical Drum & Used PPE 0.62 Mt by EDSHA Solutions Sdn Bhd. 	
<p>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.</p> <p>- Major compliance -</p>	<p>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.</p> <p>Based on the procedure, the empty containers must be triple rinsed, punctured and sold to recycler. Nonetheless, the estate still disposed through SW method due to difficulty to find collector. The following consignment notes were verified:</p> <ol style="list-style-type: none"> 1. Consignment No: 20220427178KJH0G dated 27/04/2022, SW409 Used Chemical Drum & Used PPE 0.55 Mt by EDSHA Solutions Sdn Bhd. 2. Consignment No: 2022041308NKVFCB dated 13/04/2022, SW409 Used Chemical Drum & Used PPE 0.62 Mt by EDSHA Solutions Sdn Bhd. 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
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 wastes were landfilled in the field. Based on the site visit, verified during site visit found 2 workers were segregate the plastic bottle, paper, leather materials e.g. old tyres, tubes etc. The segregation of waste was conducted prior to disposed in the pit. The recyclable wastes were segregated and sold to recycle centres. Refer DO 04889 dated 29/05/2022 collection of plastic bottles, light scrap iron etc by Pragash Rao Enterprise weight 0.82 Mt. Refer weighbridge ticket 0000161453. Stated in the Waste management Plan on Action Plan of it was noted that mostly only the organic wastes were landfilled. Management could further improve on segregation at source for Domestic waste, source from household or workstation in order for minimizing the contamination of environment from undegradable of waste. Thus, OFI was raised.	OFI
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. - Major compliance -	The estate has conducted assessment on all polluting activities through analysis of environmental aspects and impacts. The outcome was documented in the Environmental Risk Assessment. The analysis was reviewed on annual basis. Apart from that, the unit is also calculating their GHG emission through the utilization of a GHG calculator.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Environment Management Plan was established to reduce identified significant pollutants and emissions. Among the action plans verified were handling of scheduled wastes through EQA regulations, reduce usage of chemicals by using mechanical mowers, judicious spraying program to avoid over-spray, used chemical containers are triple rinsed and punctured, LCC establishment, avoid spraying along the edges of water course etc	Complied

Criterion / Indicator	Assessment Findings	Compliance				
Criterion 4.5.5: Natural water resources						
<p>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:</p> <ul style="list-style-type: none"> 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. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<ul style="list-style-type: none"> a. Water source for daily usage was from Lembaga Air Perak (LAP). Sighted monthly record has been maintained. b. Water Sampling has been conducted for Inlet and outlet monitoring. Refer Report water analysis dated 09/05/2022 with reference number 0.218(c)/806/2022. Piezometer reading was monitored at the peat area with ration 1:120 ha. Peat subsidence probe also were monitored by the estate to check the subside level of the peat area. Record of Piezometer and Peat Subsidence Probe as at April 2022 were verified. c. Water management plan has been established. Among topics discussed were: <ul style="list-style-type: none"> • To avoid pollution of raw water resources by implementing the pollution prevention plans and monitor the river water quality through water analysis • To implement the best management practice at peat area in order to maintain the water table d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the UIE Estate. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. Guidelines of the width of the rivers and natural courses to be protected have been illustrated as per guideline. <table border="1" data-bbox="1093 1302 1868 1401"> <thead> <tr> <th>River width (meter)</th> <th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th> </tr> </thead> <tbody> <tr> <td>1-5</td> <td>5</td> </tr> </tbody> </table>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	<p>Complied</p>
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak					
1-5	5					

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Criterion / Indicator		Assessment Findings		Compliance								
		<table border="1"> <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> </table> <p>e. There is no removal of natural vegetation in riparian areas. f. There is no abstraction water for water supply using bore well.</p>	5-10	10	10-20	20	20-40	40	>40	50		
5-10	10											
10-20	20											
20-40	40											
>40	50											
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There was no evidence that any bunds, weirs and dams across main rivers or waterways passing through the estate.		Complied								
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Generally, UIE Estate is terrain is flat. Water tables is maintained between 45-60 cm (acid sulphate areas), 60-90 cm (non-acid sulphate) and ,60 cm below ground surface. Verification through site visit and record found management has monitored closely on water level of the estate.		Complied								
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value												
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species),	The HCV assessment for the complex was conducted by Wild Asia. Report dated January 2008 was available for verification. The structure of the report generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species.		Complied								

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Criterion / Indicator		Assessment Findings	Compliance
	that could be significantly affected by the grower(s) activities. - Major compliance -		
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -	Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, UIE has its own self-declared conservation areas which included a botanical garden devoted to trees located near the estate's office called Kingham/Cooper Sanctuary Trees Arboretum, Bek Nielsen Sanctuary (on peat soil), Bukit Kecil Jungle Sanctuary and riparian zones at Beruas River and Anak Macang River.	Complied
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	Although there was no RTE species or HCV reported to be present in the complex, the management still made efforts to monitor the conservation areas on sighting of animals' presence and trace of human intrusion. The monitoring report was well maintained.	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	Based on the site visit, there was no evidence that fire has been used for waste disposal or other field works.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.	There is no areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. Thus, this indicator was not applicable.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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 controlled burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction. Thus, this indicator was not applicable.	Not Applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	United Plantations Berhad has established a SOP for Replanting dated 18/02/2008 which restrict the use of fire during land preparation. It is also stated in the SOP previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Agriculture best practice for the certification unit was guided by Standard Operating Procedures (Manual) (supplements) [approved by Ho Dua Tiam, Sr. Executive Director, dated 10/12/2007] which contents the following operations: <ul style="list-style-type: none"> • Nursery • Replanting • Upkeep mature/immature oil palm • Water management • Boundaries • Oil palm pest management • Manuring immature & mature oil palm 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Harvesting collection <p>The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers.</p> <p>Mechanize harvesting using Cantas at field 39 was verified and found workers were handle it with safety precautions and full PPE. Training on using that machine was given by the management.</p> <p>Mechanize Spray using Maxiboom was verified at field 34 and found the efficiency of the technique in term of the coverage and productivity. Training has been given by the management and record was verified.</p>	
4.6.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>The estate terrain is 100% flat-undulating. This was observed during field visit and as per Topographic Map UIE Estate, Bruas sheet 52. Planting of cover crop, EFB mulching and POME application were carried out to retain the soil structure and conservation.</p>	Complied
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>All fields are marked and identified. Information such as year of planting, field no and the total hectare is shown in all markers. There are both stencilled at the palm trees and displayed on signage at the boundary/corners of every fields. This was observed during the field visit. Sample observed at field no 1, 21, 39 and 109.</p>	Complied
<p>Criterion 4.6.2: Economic and financial viability plan</p>			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>UIE Estate certification unit has established and implemented its commitment to long term sustainability and improvements through a revenue budget and capital expenditure program. Revenue budget for both mill and estate with 3 years projection (2021- 2024) was verified. The budget includes operational and maintenance costs together will CAPEX for continual improvement.</p>	Complied
4.6.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>Oldest palm is planted in 2010. Youngest palm is planted on 2018. Thus, no replanting program is necessary in the next 5 years.</p>	Complied
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>UIE Estate certification unit has established and implemented its commitment to long term sustainability and improvements through a revenue budget and capital expenditure program. Revenue budget for both mill and estate with 3 years projection (2022- 2025) was verified. The budget includes operational and maintenance costs. Information about crop projection, cost of production, price forecast and revenue were also included in the budget.</p>	Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>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 to-date.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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 United Plantations Berhad own estate. For contractor, sighted contract for PSH Enterprise, dated 20/3/2022 as Super Mandore for hiring of excavator and drain works. Pricing mechanism clearly stipulated under addendum contract under rate per hour, per palm and per ha depending on type of work offered. Another super-mandore under company Saravanan signed on 1/1/2022 for contract harvesting was sighted. Period of contract is one (1) year. Rate to supermandore and harvester were clearly tabled in the contract.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major 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 Warisan Bebas Sdn Bhd, dated 01/01/2021 as Super Mandore. All contracts terms and conditions were made transparent and agreed from both parties.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	UIE Estate had informed its contractors regarding the need to follow the MSPO requirements through the agreement signed on 01/01/2021. It mentions: The contractor shall adhere to the attached UP's company policies as follows which are required under MSPO & RSPO certifications: <ol style="list-style-type: none"> 1. Human Rights Policy 2. Environment and Biodiversity Policy 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		3. OSH Policy 4. Gender Policy 5. Whistleblowers Policy 6. Code of Conduct and Business Ethics For Supermandore contracted, the Company Policy training were briefed together with other Employee. It is further verified during the interview with contractors too.	
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 summary of payment for Mar 2022, Ten Crown Enterprise	Complied
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 29/3/2018 by Dato Carl Bek-Nielson.	Complied
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 Ten Crown Enterprise, the progress works are recorded in listing of work done by contractors for the month. PV no. 622030084 dated 9/3/2022, Ten Crown Enterprise was verified.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
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.	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
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. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
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 new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	No new planting within UIE Estate. Thus, this indicator is not applicable.	Not applicable

MS 2530-4:2013 Malaysian Sustainable Palm Oil (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 Plantations Berhad has established MSPO policy which signed by Chief Executive Director, Dato’ Carl Bek-Nielsen effective date 29/3/2018. The latest policy briefing was carried out on 2/2/22. The briefing was given by the assistant engineer.	Complied
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: 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	Complied
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 2022 was made available for review. Audit schedule for UIE Palm Oil Mill and its supply bases was from 18-19/4/2022 by pool of trained internal audit from HREHS department. Cross department/mill audit was demonstrated to ensure impartiality of audit.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	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 23/4/2022. 4 NCs for site visit and for documentation audit were raised for UIE Business Unit. The action plan was submitted to Group Manager HR ESH for closure on 6/5/2022. The findings were closed on 24/5/22 based on document review and follow-up on 24/5/22.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Internal audit report and verification report dated 23/4/2022 was made available to the management for review.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The last management review was conducted on 18/05/2022. 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.	Complied

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 established are as follows: - <ul style="list-style-type: none"> • To reduce the dust emission to 0.13 g/Nm³ • To reduce the diesel usage to 0.4 to 0.3 litter/MT FFB • To install new screw press for oil extraction 	Complied
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Provisions were made in the annual and forecast business plans / budgets for the necessary resources including training, to implement the new techniques. The monitoring being done monthly and recorded.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate 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 mill is Mr N. Saravanaganes (resident engineer) as per appointment letter dated 1/4/2021 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where	United Plantations Berhad continued to use the group website for disseminating public information. The Sustainability Report and Group	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	disclosure of information would result in negative environmental or social outcomes. - Major compliance -	Annual report is available in website. Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the mill. 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. Procedure for complaints and grievances were available through UP website and medium used are via suggestion box in office or write in to United Plantations Berhad head office.	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - 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.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The officer-in-charge for mill is Mr N. Saravanaganes (resident engineer) as per appointment letter dated 1/4/2021 whom is responsible to commit and implement the sustainability concepts outline in RSPO, RSPO NEXT and MSPO P&Cs.	Complied
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 shall be properly maintained. - Major compliance -	Stakeholder’s list for both UIE Palm Oil Mill and UIE 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 27/3/21.	Complied
Criterion 4.2.3 – Traceability			

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Criterion / Indicator	Assessment Findings	Compliance
<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 d) Delivery order (DO) indicated the details of: <ul style="list-style-type: none"> • Cages number • DO number • Buyer/recipient • Date • Field number • 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 (coming from own estates) will carry the ID of certified crop. UIE Palm Oil Mill 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>Complied</p>
<p>4.2.3.2 The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Daily production report and sales & stock movement (MT) are available until to date 31 August 2020. The mass balance sheet template was used to monitor incoming and outgoing of FFB and palm product (CPO and PK).</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	Person in charge of traceability is the Deputy Group Engineer, Mr N. Saravanaganes (resident engineer) Refer to appointment letter dated 1/4/2021 signed by United Plantations Berhad Chief Executive Director.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel were maintained at the mill. Example of records evidence are as below: a. Production figures dated 1 June 2022: i) CPO Produced: 3,174.26 MT ii) PK Produced: 1,021.40 MT iii) Average tank FFA: 1.42% iv) DOBI: 2.87 % Dispatch record verified on 31/5/22; PK dispatch Weigh chit no. 0000161602 Date: 31/5/2022 Product/commodity: Palm Kernel Weight: 29.10 mt Lorry/trailer no.: AGY4212 CPO dispatch Weigh chit no. 0000161584 Date: 31/5/2022	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Product/commodity: Crude Palm Oil Weight: 41.05 mt Lorry/trailer no.: BKG8332/T/BC5891	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	<p>UIE Palm Oil Mill 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> <ul style="list-style-type: none"> • MPOB License; no: 500124504000 valid until 31/01/2023 • KDN-Diesel (Ref No: MJG/SK/D/04) valid until 25/05/2024 • Weighbridge no 1 (D096812) valid until 21/05/2022 • Weighbridge no 3 (D096815) valid until 21/05/2022 • DOE license Compliance Schedule no: 004239 valid until 30/06/2022. Method of disposal, land application. • Energy Commission (biogas grid) #ST(IP/JPE)12/1/6/272 Jld 2(9), valid until 14/03/2023 • Certificate of Fitness Boiler No. 4, #PK PMD 80415, valid until 08/07/2022 • Certificate of Fitness Air receiver #PK PMT 3835, valid until 15/02/2023 • Fire certificate from BOMBA, #JBPM:PK/7/1/2021, valid until 25/01/2023. As per letter dated 20/01/2022 from BOMBA refer 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>JBPM/PK/BKK:700-3/1/7/123 stated on there is no need of permit based on new amendment of Act.</p> <ul style="list-style-type: none"> • JTK Permit for Night shift work for female, BHG PU/9/135 Jld 14 (8) dated 19/07/2018 to UPB-UIE • JTK Permit for salary advance, no siri: 0232 to UIE (M) Sdn Bhd dated 30/08/2008 • JTK Permit for salary deduction as per Employment Act 1955 dated 01/06/2012. 	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>UIE Palm Oil Mill 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.</p> <p>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.</p>	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>UIE Palm Oil Mill 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.</p>	Complied

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		Monitoring on changes of Law and Regulation has been conducted based on any new amendments or any new regulations coming into force. Refer document tracking changes in law dated 12/05/2022 "Tracking changes in Law" stated on update of Minimum wages order 2022 and Law of Malaysia Ac A1651 Employment (Amendment) Act 2022. Previous Tracking Changes on law dated 28/04/2022 update on Interstate Movement & My Travel Pass speech by Prime Minister dated 10/10/2021	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track 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) 	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	The 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 Palm Oil Mill 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.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.	The land title, Grant number, No H.S.(D): 21320 for area of 3,845 Ha, registered to United Plantation Bhd on 24/12/04 where UIE Palm Oil Mill is includes in this area with estate. The usage of land is for	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Commodity Crop-Oil Palm. The land was granted by Kanun Tanah Negara.	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is located inside UIE Estate land and no boundary with any third party. Thus, demarcation of boundary is not necessary.	Complied
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.	Complied
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. Thus, this indicator is not applicable.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land for the portion of land. Thus, this indicator is not applicable.	Not applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land for the portion of land. Thus, this indicator is not applicable.	Not applicable

Criterion / Indicator	Assessment Findings	Compliance	
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) 2022, was conducted for UJE Mill & Estate internally and annually by the Internal Management involving all stakeholders. The latest review of SIA management plan was conducted in 12/5/22. Key areas identified in the SIA was on access and use rights, economic livelihoods and working conditions, human rights and mill operation. The recommendation from the SIA report was transferred to action plan (Social) 2021. The action plan identified the issues & strategies, action plan, responsible person and time frame. Suicide cases were reported and captured in the management plan. Action plan identified by the management: 1) No restriction of movement by all workers 2) Repatriation subject to availability of flights 3) No penalty on termination of contract prematurely	Complied
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.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Sighted the Registry of Complaints book recording all the feedback and request from stakeholders, together with its completion date. Also, for	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		external stakeholders, request or feedback to be made directly to the main office through verbal and letter.	
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.	Complied
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.	Complied
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.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Management have made contribution to the internal and external stakeholders. As seen in Annual Report 2021 book, for the whole group, United Plantation has the actual amount as below: <ul style="list-style-type: none"> • Hospital & medicine for employees, dependents and nearby communities RM 2,828,114 • Retirement benevolent fund RM 486,202 • Education, welfare, scholarships & others RM 314,887 • Bus subsidy for school children RM 88,312 • External donations RM 307,835 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • New infrastructure – road, TNB and water supply for domestic use – RM 197,401 • Employee housing – RM 10,149,666 • New infrastructure project building, community hall and place of worship – 1,963,058 • Provision of social amenities – RM 6,109,270 • Total contribution: RM 22,444,745 	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>United Plantations Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/08/2017. 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). Policy briefing has been conducted on 17/05/2022</p>	Complied
4.4.4.2	<p>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>a. United Plantations Berhad has established Safety and Health Policy signed by the Chief Executive Director dated 18/08/2017. 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>b. 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 occurred.</p>	OFI

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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. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. 	<p>Baseline Noise Risk Assessment has been conducted on 07/03/2020 with report reference number HQ/07/PEB/00/74-2020/002 – EE/0320/1223</p> <p>Audiometric test has been conducted on 31/03/2022 by Ansonex Resources Group. 137 workers have been examined and no one of them fall in the abnormal audiometric result which is Possible Occupational Hearing Impairment, Possible Occupational Threshold Shift (STS), Possible occupational NHL pattern and Possible Non Occupational Hearing Impairment.</p> <ul style="list-style-type: none"> c. The mill has 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. Refer Annual Training Plan for the year 2022. Sample of training record verified were PPE Training on 17/05/2021, MSDS Training on 15/04/2022. d. Records of PPE issued to individual workers and contractors, including signatures to confirm receipt was available. PPE standard is based on CHRA assessor's recommendation, SOP and HIRARC. The control of COVID-19 spreading is continued to be implemented which among others include of pre-entry test for visitors, checking of body temperature, face mask usage, had sanitizing, regular disinfecting of workplace, and social distancing. Verification through site visit confirmed that workers have good understanding on the importance of PPE. PPE was given free by the management and replaced upon request due to damage. e. SOP for chemical handling at the laboratory has been established based on HIRARC. Chemical handling training was conducted on 15/04/2022. SDS were placed at the chemical store and sample checked found that the SDS were up to date and consists of 2 	

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<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>language which is Bahasa and English. Sample check on SDS of Hexane and Diesel.</p> <p>f. 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. There is also a safety officer appointed as a person of trust shall have knowledge and access to latest national regulations and collective agreements for UP. Latest appointment letter for OSH Committee was on 04/03/2022.</p> <p>g. The committee conducted the meetings on quarterly basis to discuss issues regarding safety and health. Internal Memorandum (Notification has been distributed to all committee 10 days before the meeting. Minutes of meeting was verified. Latest meetings were conducted as below:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>OSH Meeting</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1st Meeting 2022</td> <td>23/03/2022</td> </tr> <tr> <td>4th Meeting 2021</td> <td>30/11/2021</td> </tr> <tr> <td>3rd Meeting 2021</td> <td>25/08/2021</td> </tr> <tr> <td>2nd Meeting 2021</td> <td>10/05/2021</td> </tr> <tr> <td>1st Meeting 2021</td> <td>10/02/2021</td> </tr> </tbody> </table> <p>h. Accident and emergency procedures had been established and briefed to staff, workers, contractors, and visitors. Emergency Response Team organization chart for 2022 was made available and divided with 2 teams which is Team Shift A and Team Shift B. Workers trained in firefighting, rescue method and prepared for the any unforeseen circumstances. Latest fire drill was carried out on 18/05/2022. Fire extinguisher checklist has been maintained and latest inspection was carried out on 06/04/2022. Verified</p>	OSH Meeting	Date	1 st Meeting 2022	23/03/2022	4 th Meeting 2021	30/11/2021	3 rd Meeting 2021	25/08/2021	2 nd Meeting 2021	10/05/2021	1 st Meeting 2021	10/02/2021	
OSH Meeting	Date													
1 st Meeting 2022	23/03/2022													
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1 st Meeting 2021	10/02/2021													

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	<p>through site visit all fire extinguisher were valid. Firefighting system were working well and maintained. Inspection was conducted by the Proguard Safety (Northern) Sdn Bhd. Refer quotation dated 09/05/2022 with reference number EQ2022.001/UIE. Last inspection was conducted by the HJenree Chuah Engineering on 02/07/2021. Refer Invoice IVFE-2107-003</p> <p>i. First aid kits were available at various stations at the mill. Latest first aid training was conducted on 20/05/2022. Sample of checking found that HA were monitored the contents of First aid in monthly basis.</p> <p>The monitoring of inventory for first aid box contents and awareness on first aider can be further improved by ensuring that effectiveness of the training given. Thus, OFI was raised.</p> <p>j. The mill maintains 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. 2 accident recorded for the year of 2021 and no accident recorded for the year 2022. JKKP 8 for was submitted to DOSH on annually basis. All accident cases were reviewed during OSH Committee meeting conducted on quarterly basis. Accidents was reported to the JKKP 6 and JKKP 8 and investigation of the accident was documented.</p> <p>JKKP 6 has been report for the 2 accident cases dated 14/07/2021 and 17/12/2021. Investigation of accident cases has been made by the management and record was maintained. Medical certificate was kept in the individual file. Training has been given and engineering control has been made for management corrective action.</p>	

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		<p>JKKP 8 was submitted to DOSH on 13/01/2022 for 2021 summary of cases with reference number JKKP8/65310/2021. Total loss of work recorded with 125 days from the 2 cases.</p> <p>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for December 2021 for the mill. SOCSO dated 01/04/2022 and 14/04/2022 with voucher number D4600740/2022 and D4600995/2022 respectively.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>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.</p> <p>- Major compliance -</p>	<p>UIE Palm Oil Mill implemented their Human Rights Policy, signed by Dato' Carl Bek-Nielsen on 09/03/2020. The management is treated the workers with respect and dignity. Awareness training on human rights policy has been conducted on 2/2/22.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>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 evidence of discrimination was observed. Job opportunities and amenities such as free housing, subsidized rate of water and electric supplier (connect to national water and electricity supply) and medical care are given to all employees without discrimination.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</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 latest Collective Agreement referred is MAPA/NUPW POM Employees Agreement 2019.</p>	Complied

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	- Major compliance -	<p>The payroll for the following sampled workers for January 2022 (low crop), February 2022 (average/normal) and October 2021 were verified to be consistent with the Minimum Wages Order 2020.</p> <p>List of sampled workers as per below:</p> <ol style="list-style-type: none"> 1) Workers ID: 400899 2) Workers ID: 412935 3) Workers ID: 307260 4) Workers ID: 414799 5) Workers ID: 210175 6) Workers ID: 415860 7) Workers ID: 416027 8) Workers ID: 416089 9) Workers ID: 416223 <p>There was no complaint raised 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 2020 which achieved more than RM 1200/ month or RM 46.15/day.</p>	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Sampled the contractor's worker (Excellent Insight Sdn Bhd) for CPO transporter in UIE Palm Oil Mill. Below pay slip for March 2022 were reviewed:</p> <ol style="list-style-type: none"> 1. Employee ID: 921108086261 2. Employee ID: 930830086781 	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and	The workers master list was reviewed. The list includes date of birth, date joined, gender, nationalities. etc.	Complied

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	subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -		
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	<p>The following contracts has been verified to confirm that workers have binding working agreement with the company: The payroll for the following sampled workers for January 2022 (low crop), February 2022 (average/normal) and October 2021 were verified to be consistent with the Minimum Wages Order 2020.</p> <p>List of sampled workers as per below:</p> <ol style="list-style-type: none"> 1) Workers ID: 400899 2) Workers ID: 412935 3) Workers ID: 307260 4) Workers ID: 414799 5) Workers ID: 210175 6) Workers ID: 415860 7) Workers ID: 416027 8) Workers ID: 416089 9) Workers ID: 416223 <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>	Complied

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4.4.5.7	<p>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 Palm Oil Mill to records the accurate working hours and overtime and recorded in UIE TMS Master Report. Verified the overtime and working hours:</p> <p>The payroll for the following sampled workers for January 2022 (low crop), February 2022 (average/normal) and October 2021 were verified to be consistent with the Minimum Wages Order 2020.</p> <p>List of sampled workers as per below:</p> <ol style="list-style-type: none"> 1) Workers ID: 400899 2) Workers ID: 412935 3) Workers ID: 307260 4) Workers ID: 414799 5) Workers ID: 210175 6) Workers ID: 415860 7) Workers ID: 416027 8) Workers ID: 416089 9) Workers ID: 416223 	Complied
4.4.5.8	<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>There is face recognition for UIE Palm Oil Mill to records the accurate working hours and overtime and recorded in UIE TMS Master Report. In case the worker is on leave/absence, it is recorded in the same system. Based on OT summary report in October 2021, January 2022 and March 2022, maximum OT hours recorded at 91.5 hours.</p>	Complied
4.4.5.9	<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>The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955, Minimum Wage Order 2020 and worker's employment contract.</p>	Complied

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<p>4.4.5.10 Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional 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 estate’s clinics. As seen in Annual Report 2021 book, for the whole group, United Plantation has the actual amount as below:</p> <ul style="list-style-type: none"> • Hospital & medicine for employees, dependents and nearby communities RM 2,828,114 • Retirement benevolent fund RM 486,202 • Education, welfare, scholarships & others RM 314,887 • Bus subsidy for school children RM 88,312 	<p>Complied</p>
<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.</p> <p>- Major compliance -</p>	<p>The basic amenities and facilities at the quarters provided by the company to it workers include electricity, water and domestic waste disposal. Electricity and water are 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.</p>	<p>Complied</p>
<p>4.4.5.12 The management shall establish a policy 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>Complied</p>
<p>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</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 union. The workers have their freedom to join the NUPW/MAPA union</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance						
	<p>unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>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 22/06/2020 and attended by 31 workers for both UIE Palm Oil Mill and UIE Estate. Some of the issue sighted are:</p> <ol style="list-style-type: none"> 1. Request to stop selling illegal alcohol drink that lead to fights at night. Action: chairman instructed Auxiliary Police to make a regular inspection at nights. 2. Complaint on damaged lamp post at Estate 1A difficulty the user at night. Action: Auxiliary Police to check the current condition and complaint to management if the lamp post is damaged. <p>Sighted the appointment letter for the committee members from Nepal, Bangladesh, Indonesian and India dated 01/01/2020 valid until 31/12/2020.</p>							
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>The Human Rights Policy was established and signed by Dato’ Carl Bek-Nielsen on 09/03/2020. The Policy mentioned that UPB will not tolerate the use of child or force labour, slavery or human trafficking in any of their plantations and facilities (anyone who less than 18 years old).</p>	Complied						
Criterion 4.4.6: Training and competency									
4.4.6.1	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p>	<p>The mill has established training program for all management, employees, and contractors as per training need analysis conducted. The training records has been maintained and available for review. Following training records were verified: –</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Ergonomic Re Assessment</td> <td>30/05/2022</td> </tr> <tr> <td>SW Training</td> <td>27/05/2022</td> </tr> </tbody> </table>	Training	Date	Ergonomic Re Assessment	30/05/2022	SW Training	27/05/2022	Complied
Training	Date								
Ergonomic Re Assessment	30/05/2022								
SW Training	27/05/2022								

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Criterion / Indicator		Assessment Findings		Compliance
		Hearing Conservation training	25/05/2022	
		First Aid Training	20/05/2022	
		ERP Training	18/05/2022	
		PPE Training	17/05/2022	
		Loco Handling Training	19/04/2022	
		MSDS Training	15/04/2022	
		Chemical Handling Training	15/04/2022	
		Policy Briefing	17/05/2022	
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 -	All the trainings mentioned in Indicator 4.4.6.1 were identified through training needs analysis which is based on type of jobs and recommendation by external assessors related to occupational safety.		Complied
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 and responsibility in accordance to the documented training procedure. - Minor compliance -	The mill reviewed the training need analysis and program on annually basis to ensure the continuous training for all workers. Training evaluation forms were also utilized to ensure the effectiveness of the training conducted.		Complied
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 18/08/2017 was signed by UPB's Chief Executive Director, Dato' Carl Bek-Nielsen. Policy briefing has been conducted on 17/05/2022.		Complied

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Criterion / Indicator		Assessment Findings	Compliance						
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 -	Environmental Impact Assessment (EIA) was last reviewed in January 2022. There were 3 main criteria considered in the assessment i.e. severity, quantity/load, probability. From the assessment, the information about the level of environmental risks were then obtained and it was important to determine the action plan thereafter. Verification of the assessment report showed that all activities in the mill that could interact with the environment were assessed.	Complied						
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	The mill has established Environmental Action Plan based on the Environmental Risk Assessment conducted. The Action plan was reviewed on annual basis. Sample of management plan as below: <ul style="list-style-type: none"> • Steriliser: Channel all condensate to effluent plan • Crane: Weekly preventive maintenance on motors and pulleys • Boiler: Install dust collectors and smoke density monitoring and install flowmeter for exact reading. 	Complied						
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Positive impact on environment was identified through the environmental risk assessment. Based on the assessment, there is no positive impact to the environment arise from the mill activities identified.	Complied						
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	The mill has established training programs that covered the subjects 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. Among the training related environment were: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>SW Training</td> <td>27/05/2022</td> </tr> <tr> <td>Chemical Handling Training</td> <td>15/04/2022</td> </tr> </tbody> </table>	Training	Date	SW Training	27/05/2022	Chemical Handling Training	15/04/2022	Complied
Training	Date								
SW Training	27/05/2022								
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Criterion / Indicator		Assessment Findings	Compliance																
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Discussion on the concern of workers about the environmental quality was done through meetings, morning muster and stakeholders meeting. Records of attendance were maintained. Environment meeting dated 12/05/2022 was available for verification.	Complied																
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The monitoring of non-renewable energy usage was done on monthly basis. The fuel consumption record is combined with UIE Estate. Based on the data and plotted graph, the consumption trend seemed to be going downwards for the past 3 years.	Complied																
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 of the direct usage of non-renewable energy for the mill's 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 operating unit annual budgets. Target from the company was 0.33 L/MT. The high usage for 2022 due to use old boiler. New boiler was under maintenance during the visit. <table border="1" data-bbox="1048 1114 1720 1252"> <thead> <tr> <th colspan="4">UIE Palm Oil Mill</th> </tr> <tr> <th>Year</th> <th>FFB processed</th> <th>Diesel/L</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>284197.87</td> <td>89078</td> <td>0.31</td> </tr> <tr> <td>2022 TDT</td> <td>85371.19</td> <td>32192.00</td> <td>0.38</td> </tr> </tbody> </table>	UIE Palm Oil Mill				Year	FFB processed	Diesel/L	Diesel/FFB	2021	284197.87	89078	0.31	2022 TDT	85371.19	32192.00	0.38	Complied
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4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Renewable energy used is from biofuel (shell and fibre) for boiler start-up. Renewable energy, from the methane capturing at biogas plant, generates electricity and supplied to national grid. This helped the mill to improve the efficiency of fossil fuel consumption.	Complied																

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Criterion / Indicator		Assessment Findings				Compliance
		2021	Produce	Boiler	Sold	
		Shell	17051.82	14609.07	2442.75	
		Fibre	39787.70	39787.70	-	
		2022 TDT	Produce	Boiler	Sold	
		Shell	5122.27	4803.20	319.07	
		Fibre	11951.97	11951.97	-	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy						
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>The mill had identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. Among the wastes identified were:</p> <ul style="list-style-type: none"> • Domestic waste: rubbish from the mill complex and employees' quarters (disposed by estate management). • Recyclable wastes: Fibre, palm kernel shell, boiler ash, scrap iron • Scheduled wastes: Spent IPA, contaminated oil filter, spent lubricants, spent hydraulic oil, empty grease containers, used batteries 				Complied
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: <ol 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. - Major compliance -	<p>The mill has established waste management plan based on the waste identified and documented in Types of Waste Products and Method of Disposal, Action Plan to Reduce Waste. The following implementation of the management plans were verified:</p> <ul style="list-style-type: none"> • Scheduled wastes inventory was recorded in Scheduled Waste Logbook before submitted to DOE through e-swiss • Fibre and Kernel were used as boiler fuel • EFB were disposed through land application at the estate 				Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.3.3 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 mill has established a flow chart for Scheduled Waste Handling for all scheduled waste generated such as SW102, SW305, SW410, SW409 and SW404 as per regulation. The mill also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>Latest Inventory Date: 28/05/2022 File No: A31/152/000/038 Type of SW generated: 305, 306, 409, 410</p> <p>Latest disposal Date: 14/04/2022 Consignment note: 2022041416CMAR1Z Type of SW: 102 Weight: 0.305 MT Contractors: YOKOHAMA Reclamation Sdn Bhd</p> <p>Latest disposal Date: 26/05/2022 Consignment note: 2022052620Z8M4CL Type of SW: 306 Weight: 1.00 MT Contractors: SP Metro (M) Sdn Bhd</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Verification disposal licence by contractors:</p> <ul style="list-style-type: none"> Contractors: SP Metro (M) Sdn Bhd – DOE Licence number: 003777 valid until 30/04/2023 Contractors: YOKOHAMA Reclamation Sdn Bhd – DOE Licence number: 004179 valid until 30/04/2023 <p>Competence person on CePSWam for mill on handling the schedule waste has been appointed to Mr Shathan Govalo Krishnan dated 16/12/2020 with certificate reference CePSWam/04202.</p>	
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>Domestic wastes disposal is managed by the estate. Refer to Indicator 4.5.3.5 of MSPO Part 3.</p>	Complied
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 has conducted assessment on all polluting activities through analysis of environmental aspects and impacts. The outcome was documented in the Environmental Risk Assessment. The analysis was reviewed on annual basis. Apart from that, the unit is also calculating their GHG emission through the utilization of a GHG calculator.</p>	Complied
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Environment Management Plan was established to reduce identified significant pollutants and emissions. Among the action plans verified were handling of scheduled wastes through EQA regulations, regular desludging of effluent ponds, installation of dust collectors at boilers' chimneys, etc.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to monitor their Air Emission. Below are the verified reports:</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
		<p>Report Date: 30/04/2021 Monitoring date: 20/04/2021 Report reference: MURNI/0421/4785 Assessor: CSK Murni Services Sdn Bhd Certificate of analysis:</p> <table border="1"> <thead> <tr> <th>Test Parameter</th> <th>Test Results</th> </tr> </thead> <tbody> <tr> <td>Dust Concentration</td> <td>75 mg/m3</td> </tr> <tr> <td>Temperature</td> <td>232</td> </tr> <tr> <td>Nitrogen Monoxide</td> <td>75 mg/m3</td> </tr> <tr> <td>Nitrogen Dioxide</td> <td>44 mg/m3</td> </tr> <tr> <td>Sulphur Dioxide</td> <td>37 mg/m3</td> </tr> <tr> <td>Carbon Dioxide</td> <td>7.3%</td> </tr> <tr> <td>Carbon Monoxide</td> <td>9.5 ppm v/v</td> </tr> <tr> <td>Oxygen</td> <td>15.6%</td> </tr> <tr> <td>Dark smoke</td> <td>Not exceed chart No 1</td> </tr> </tbody> </table> <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were in established for Dark smoke emissions monitored.</p>	Test Parameter	Test Results	Dust Concentration	75 mg/m3	Temperature	232	Nitrogen Monoxide	75 mg/m3	Nitrogen Dioxide	44 mg/m3	Sulphur Dioxide	37 mg/m3	Carbon Dioxide	7.3%	Carbon Monoxide	9.5 ppm v/v	Oxygen	15.6%	Dark smoke	Not exceed chart No 1	
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4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>UIE Palm Oil Mill is using the biochemical treatment plant to treat its effluent through series of ponds such as cooling, aerobic and anaerobic. A biogas plant is also in place as part of the treatment series. Under the DOE's Compliance Schedule (Jadual Pematuhan), UIE Palm Oil Mill is required to treat its effluent until the BOD level is below 5,000 mg/l before applying it to land application through furrow system. Based on the latest four quarterly returns to the DOE, BOD readings of final discharge were all below 5,000 mg/l. The samples of</p>	Complied																				

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Criterion / Indicator	Assessment Findings	Compliance												
	<p>final discharge were analysed by an accredited third-party laboratory named Union Laboratories Sdn Bhd.</p> <p>OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission was verified. Refer to the latest report for dated October 2021. Monthly analysis was done for final discharge point. Total of 11 parameters (pH, BOD3, COD, TS, SS, TN, AN, N and etc.) were tested. Latest analysis report for 1st Quarter of 2022 were verified.</p> <p>File reference Number: A31/152/000/038</p> <table border="1" data-bbox="1050 746 1680 882"> <thead> <tr> <th>Date of report</th> <th>Sample Date</th> <th>BOD</th> </tr> </thead> <tbody> <tr> <td>11/04/2022</td> <td>06/01/2022</td> <td>142</td> </tr> <tr> <td></td> <td>04/02/2022</td> <td>246</td> </tr> <tr> <td></td> <td>11/03/2022</td> <td>222</td> </tr> </tbody> </table> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan License Number: 004239, AS(B)A31/152/000/038.</p> <p>Environmental 3rd Party Audit was conducted by DPKR Consults Services dated 22/12/2021 with report reference number DPKR/1221/5050 dated 05/01/2022. There is 2 issue raise related on boundary Noise report and eMAINS System. Verified corrective action has been done. Refer Environmental Monitoring Report – Boundary Noise, with reference MURNI/1221/5062 dated 11/01/2021 and eMAINS System submitted dated 06/05/2022.</p>	Date of report	Sample Date	BOD	11/04/2022	06/01/2022	142		04/02/2022	246		11/03/2022	222	
Date of report	Sample Date	BOD												
11/04/2022	06/01/2022	142												
	04/02/2022	246												
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<p>Criterion 4.5.5: Natural water resources</p>														

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Criterion / Indicator		Assessment Findings	Compliance												
4.5.5.1	<p>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 (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Water management plan has been established and implemented by the mill. The objective of the plan is to maintain the quality and availability of natural water resources. The plans, among others were:</p> <ul style="list-style-type: none"> • To minimize wastage of treated water through maintenance of pipelines and monitoring of water consumption by employees • To avoid pollution of raw water resources by implementing the pollution prevention plans and monitor the river water quality through water analysis. Target 1.30 <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed</th> <th>Water/m3</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>284197.87</td> <td>398690</td> <td>1.40</td> </tr> <tr> <td>2022 TDT</td> <td>85371.19</td> <td>118290</td> <td>1.39</td> </tr> </tbody> </table>	Year	FFB Processed	Water/m3	Water/FFB	2021	284197.87	398690	1.40	2022 TDT	85371.19	118290	1.39	Complied
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2021	284197.87	398690	1.40												
2022 TDT	85371.19	118290	1.39												
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>POME is not discharged to any water course. It is disposed through land application as prescribed under Jadual Pematuhan (compliance schedule) no. 004239. Monitoring of BOD of the POME is done through lab analysis. The results were submitted to the DOE through quarterly report.</p>	Complied												
4.6 Principle 6: Best Practices															
Criterion 4.6.1: Mill Management															
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>UIE Palm Oil Mill maintains its Standard Operating Procedure for mill operations, dated 22/02/2017. Among the operations covered are:</p> <ul style="list-style-type: none"> • Reception Station • Fruit Handling 	OFI												

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Sterilization • Threshing • Empty Bunch Press • Digestion and pressing • Clarification • Kernel Extraction • Effluent Treatment & Waste Management. <p>Site visit at skid tank found that the firefighting implementation has been established, the area of skid tank was bunded and mitigation action can be taken if any spillage occurs. Water pump house has been locked and procedure on repairing the water pump and pipes were documented.</p> <p>The mechanism of implementation the procedure at skid tank (Diesel) and Water Pump house can be further improved by ensuring monitoring of best management practice in order to make sure all aspects related safety and environment matters were fully implemented. Thus, OFI was raised</p>	
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 Chief Executive Director (CED) visited the operating units from time to time. The report covers on all aspect of operation. The mill has taken necessary actions to rectify the CED's comments.	Complied
Criterion 4.6.2: Economic and financial viability plan			

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Criterion / Indicator		Assessment Findings	Compliance
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 Palm Oil Mill certification unit has established and implemented its commitment to long term sustainability and improvements through a revenue budget and capital expenditure program. Revenue budget for both mill and estate with 3 years projection (2022 - 2025) was verified. The budget includes operational and maintenance costs	Complied
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 Excellent Insight Sdn Bhd, for CPO transporter dated 01 January 2022. The agreement is valid until 31 Dec 2022.	Complied
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 Excellent Insight Sdn Bhd, for CPO transporter dated 01 January 2022. All contracts terms and conditions were made transparent and agreed from both parties. Seen also the payment voucher no 0322011478 for Excellent Insight Sdn Bhd, for CPO transporter dated dated 13/5/2022	Complied
Criterion 4.6.4: Contractor			
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 Palm Oil Mill had informed its contractors regarding the need to follow the MSPO requirements through the agreement signed on 01/01/2020. It mentions: The contractor shall adhere to the attached UP's company policies as	Complied

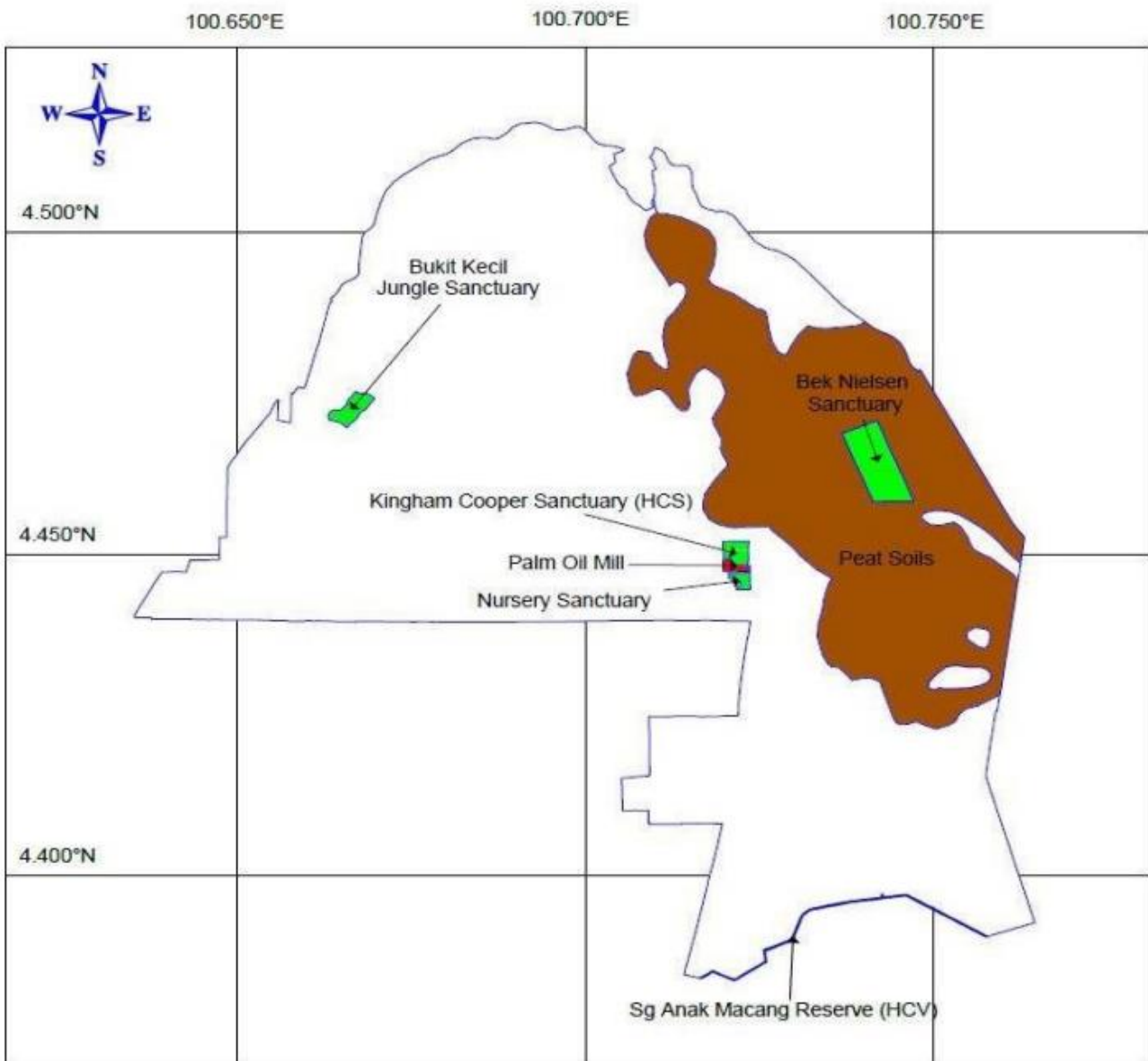
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Criterion / Indicator		Assessment Findings	Compliance
		<p>follows which are required under MSPO & RSPO certifications:</p> <ol style="list-style-type: none"> 1. Human Rights Policy 2. Environment and Biodiversity Policy 3. OSH Policy 4. Gender Policy 5. Whistleblowers Policy 6. Code of Conduct and Business Ethics 	
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Sample of contract sighted for Sakthy Transport Sdn Bhd, for CPO transporter dated 01 January 2020. All contracts terms and conditions were made transparent and agreed from both parties. Evidence of agreed contracts with the contractors were verified.</p>	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>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.</p>	Complied

Appendix C: Location and Field Map



United Plantations Berhad
UIE Estates



Appendix D: 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