

**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 Plantations Berhad-Jendarata Palm Oil Mill & Plantations: Jendarata Estate, Seri Pelangi Estate and Tanarata Estate
Date of Final Report: 3/10/2022

Report prepared by:
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Report Number: 3511517

Assessment Conducted by:
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TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Other Certifications	4
1.4 Location of Certification Unit	4
1.5 Certified Area	4
1.6 Plantings & Cycle	4
1.7 Certified Tonnage of FFB	5
1.8 Uncertified Tonnage of FFB.....	5
1.9 Certified Tonnage	5
1.10 Actual Sold Volume (CPO).....	5
1.11 Actual Sold Volume (PK).....	6
Section 2: Assessment Process	7
2.1 BSI Assessment Team	8
2.2 Impartiality and conflict of interest	9
2.3 Accompanying Persons	9
2.4 Assessment Plan	10
Section 3: Assessment Findings	12
3.1 Details of audit results.....	12
3.2 Details of Nonconformities and Opportunity for improvement	12
3.3 Status of Nonconformities Previously Identified and OFI	14
3.4 Summary of the Nonconformities and Status	17
3.5 Issues Raised by Stakeholders	18
3.6 List of Stakeholders Contacted	19
Section 4: Assessment Conclusion and Recommendation	20
Appendix A: Summary of the findings by Principles and Criteria.....	21
Appendix B: Smallholder Member Details.....	107
Appendix C: Location and Field Map.....	108
Appendix D: List of Abbreviations	112

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
	Jendarata Palm Oil Mill	508108704000	31/03/2023
	Jendarata Estate	501550502000	31/03/2023
	Seri Pelangi Estate	502207202000	31/10/2022
	Tanarata Estate	618605002000	31/07/2023
Address	Jalan Klang - Teluk Intan, 36009 Teluk Intan, Perak, Malaysia		
Management Representative	Lee Kian Wei		
Website	www.unitedplantations.com	E-mail	lkw@unitedplantations.com
Telephone	05-643 6271	Facsimile	05-641 7100

1.2 Certification Information			
Certificate Number	Mill: MSPO 693201 Estate: MSPO 693204	Certificate Start Date	07/09/2018
Date of First Certification	07/09/2018	Certificate Expiry Date	06/09/2023
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	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements 		
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)	26-28/06/2018		
Continuous Assessment Visit Date (CAV) 1	17-20/06/2019		
Continuous Assessment Visit Date (CAV) 2	23-25/09/2020		
Continuous Assessment Visit Date (CAV) 3	13-15/09/2021: Remote audit		
Continuous Assessment Visit Date (CAV) 4	13-16/06/2022		

MSPO Public Summary Report

Revision 2 (Nov 2021)

1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 709996	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn. Bhd.	13/08/2024
RSPO 693200	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019 (IP)	BSI Services Malaysia Sdn. Bhd.	28/09/2027

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
Jendarata Palm Oil Mill	Jalan Klang - Teluk Intan, 36009 Teluk Intan, Perak, Malaysia	3° 51' 11.36" N	100° 58' 09.43" E
Jendarata Estate	Jalan Klang - Teluk Intan, 36009 Teluk Intan, Perak, Malaysia	3° 54' 45.12" N	100° 56' 42.79" E
Seri Pelangi Estate	Batu 11 ¾, Jalan Bidor, 36009 Teluk Intan, Perak, Malaysia	3° 59' 36.99" N	101° 09' 34.99" E
Tanarata Estate	Batu 7, Jalan Changkat Jong, 36008 Teluk Intan, Perak, Malaysia	3° 58' 11.58" N	101° 05' 48.71" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Jendarata Estate	5,201.41	3.15	1,131.08	6,335.64	82.10
Seri Pelangi Estate	1,329.00	-	93.00	1,422.00	93.46
Tanarata Estate	3,375.32	58.56	207.94	3,641.82	92.68
Total (ha)	9,905.73	61.71	1,432.02	11,399.46	86.90

Notes: Some unplanted area (58 ha) was declared as HCV based on internal assessment conducted in March 2022.

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Jendarata Estate	551.47	2,651.25	1,331.73	666.96	-	4,991.76	209.65
Seri Pelangi Estate	120.00	321.00	159.00	510.00	219.00	1,209.00	120.00

MSPO Public Summary Report Revision 2 (Nov 2021)

Tanarata Estate	3,200.79	-	174.53	-	-	682.20	2,693.12
Total (ha)	3,872.26	2,972.25	1,665.26	1,176.96	219.00	6,882.96	3,022.77

1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Sep 21 - Aug 22)	Actual (Sep 21 - May 22)	Forecast (Sep 22 - Aug 23)
Jendarata Estate	130,000.00	83,644.38	130,000.00
Seri Pelangi Estate	35,000.00	20,825.41	38,000.00
Tanarata Estate	-	950.93	25,000.00
Lima Blas Estate *	-	834.04	-
Total (mt)	165,000.00	106,254.76	193,000.00

Note:

* MSPO certified estate under Ulu Bernam Optimill certification; Certificate # MUTU-MSPO/015

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Sep 21 - Aug 22)	Actual (Sep 21 - May 22)	Forecast (Sep 22 - Aug 23)
Nil	N/A	N/A	N/A
Total (mt)	N/A	N/A	N/A

Note: -

1.9 Certified Tonnage

	Estimated (Sep 21 - Aug 22)	Actual (Sep 21 - May 22)	Forecast (Sep 22 - Aug 23)
	Mill Capacity: 50 MT/hr	FFB	FFB
	165,000.00	106,254.76	193,000.00
SCC Model: SG	CPO (OER: 23.50 %)	CPO (OER: 22.95 %)	CPO (OER: 23.50 %)
	38,775.00	24,381.02	45,355.00
	PK (KER: 5.50 %)	PK (KER: 4.58 %)	PK (KER: 5.50 %)
	9,075.00	4,862.41	10,615.00

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
24,381.02	-	-	22,400.00	-	22,400.00

MSPO Public Summary Report
Revision 2 (Nov 2021)

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
4,862.41	-	-	4,500.00	-	4,500.00

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 13-16/06/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Jendarata POM, Jendarata Estate, Seri Pelangi Estate and Tanarata Estate as a MSP0 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 not using MSP0 certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSP0 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 MSP0 Certification Requirement. The sampling of smallholders was 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 (3). 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 MSP0 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.

MSPO Public Summary Report
Revision 2 (Nov 2021)

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)	Extension of scope	Year 5 (ASA 4)
Jendarata Palm Oil Mill	✓	✓	✓	✓	-	✓
Jendarata Estate	✓	✓	✓	✓	-	-
Seri Pelangi Estate	✓	✓	✓	✓	-	✓
Tanarata Estate	-	-	-	-	✓	✓

Tentative Date of Next Visit: June 5, 2023 - June 9, 2023

Total No. of Mandays: 11

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>
Hafriazhar Mohd. Mokhtar (HMM)	Team Leader	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia.</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011-present) in certifications auditing.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV and GIS Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training.</p> <p>Aspect covered in this audit: During this assessment he assessed the aspects of Legal, social aspects, employee’s welfare and stakeholders’ consultations & communications.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p>
Nor Halis Abu Zar (NHA)	Team Member	<p>Education: Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara.</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

		<p>Work Experience: He has 6 years' experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course and SMETA Requirement Training.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of Legal, mill & estate best practices, traceability and occupational safety.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p>
Ismadi Ismail (II)	Team Member	<p>Education: Holds a Diploma in Planting Industry Management from MARA Institute of Technology.</p> <p>Work Experience: 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation.</p> <p>Training attended: He has completed the trainings of Agriculture Code of Practice, MSPO Lead Assessor Course, OHSAS 18001 Lead Assessor Course and ISO 9001:2015 Lead Assessor Course.</p> <p>Aspect covered in this audit: During this assessment he assessed the aspects of Legal requirements, biodiversity conservation, water & wastes management, environmental aspects, occupational health and safety, GAP, trainings, and economic management plan.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p>

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
	N/A	

MSPO Public Summary Report

Revision 2 (Nov 2021)

2.4 Assessment Plan

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

Date	Time	Subjects	HMM	NHA	II
Sunday 12/6/2022	PM	Audit Team Travelling	✓	✓	✓
Monday 13/6/2022 Jendarata POM	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by UP Jendarata Business Unit • Presentation by BSI Lead Auditor – introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓	✓	✓
	09:00 - 12:30	Jendarata Palm Oil Mill Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	12:30 - 13:30	Lunch break			
	13:30 - 16:30	Jendarata Palm Oil Mill Document Review (MS2530 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, P6: Best practices	✓	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓	✓
Tuesday 14/6/2022 Seri Pelangi Estate	09:00 - 12:30	Seri Pelangi Estate <ul style="list-style-type: none"> - Estate assessment: Field visit, field operations e.g. harvesting, spraying, manuring, nursery, water treatment, genset, staff & workers interview, boundary inspection, buffer zone, HCV area, IPM implementation, landfill etc. - Workstation & facilities visit, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, scheduled waste management, worker housing, clinic etc. 	✓	✓	✓
	12:30 - 13:30	Lunch break			
	13:30 - 16:30	Seri Pelangi Estate Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment,	✓	✓	✓

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	HMM	NHA	II
		natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting			
	16:30 - 17:00	Interim closing meeting	✓	✓	✓
Wednesday 15/6/2022 Seri Pelangi Estate & Tanarata Estate	09:00 - 12:30	Seri Pelangi Estate - Continue with documentation review - Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-	-
		Tanarata Estate - Estate assessment: Field visit, field operations e.g. harvesting, spraying, manuring, nursery, water treatment, genset, staff & workers interview, boundary inspection, buffer zone, HCV area, IPM implementation, landfill etc. - Workstation & facilities visit, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, scheduled waste management, worker housing, clinic etc.	-	✓	✓
	12:30 - 13:30	Lunch break			
	13:30 - 16:30	Tanarata Estate Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting	✓	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓	✓
Thursday 16/6/2022 Tanarata Estate	09:00 - 12:30	Tanarata Estate - Continue with field & facilities visit - Continue documentation review	✓	✓	-
	12:30 - 13:30	Lunch break			
	13:00 - 15:30	Continue documentation review	✓	✓	-
	15:30 - 16:30	Audit team discussion & preparation for closing meeting	✓	✓	-
	16:30 - 17:00	Closing meeting • Presentation of findings by BSI Lead Auditor	✓	✓	-

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 was one (1) Minor nonconformity and three (3) OFIs raised. The United Plantations Berhad Jendarata Palm Oil Mill and supply base as Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

Non-Conformity Report			
NCR Ref #:	2213098-202206-N1	Issue Date:	16/06/2022
Due Date:	Next assessment	Date of Closure:	Open
Area/Process:	United Plantations Berhad Jendarata Business Unit – Seri Pelangi Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 (d) Minor
Clause Requirements:	The occupational safety and health plan shall cover the following: 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).		
Statement of Nonconformity:	The enforcement of PPE usage at harvesting area was not effectively implemented.		
Objective Evidence:	During site visit at Seri Pelangi Estate Field No 7, 10 harvesters were interviewed. PPE was given to them and replaced by the management for any damaged PPE. Refer PPE issuance record dated 18/05/2022 found Wellington Boots has been given to the harvester. Training on Harvesting and PPE has been conducted on 18/04/2022 However, 2 harvesters over 10 harvesters (Shuhaq Passport No: EJ0157XXX and Ardi Passport No: AU187XXX were wearing crocs sandals and modified rubber shoes respectively. It was not in line with SOP Harvesting Oil Palm Review 2021 Section 1.		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	Personal Protect Equipment (iii) and HIRARC – Harvesting (Risk Control) dated 16/03/2021.
Corrections:	<ul style="list-style-type: none"> To conduct awareness briefing for the staff, mandores and harvesters on wearing proper rubber shoes. To develop a monthly checklist on the monitoring of PPE for harvesters.
Root cause analysis:	Lack of enforcement by the Estate management to ensure the harvesters are wearing rubber shoes.
Corrective Actions:	The Safety Officers to conduct routine audits on the proper use of checklist and ensure compliance on the ground.
Assessment Conclusion:	CAP has been accepted. Evidence of accepted CAP implementation will be verified its effectiveness during next assessment.

Opportunity For Improvement			
Ref:	2213098-202206-I1	Clause:	MSPO 2530 Part 4: 4.4.4.2 (i)
Area/Process:	Jendarata Palm Oil Mill		
Objective Evidence:	The first aider awareness on identification of all items in the box can be further improved on ensuring the effectiveness of training given.		

Opportunity For Improvement			
Ref:	2213098-202206-I2	Clause:	MSPO 2530 Part 3: 4.5.3.2
Area/Process:	Seri Pelangi Estate		
Objective Evidence:	The implementation of established Waste Management Plan could be further improved on the efficiency of empty chemical containers reuse activity.		

Opportunity For Improvement			
Ref:	2213098-202206-I3	Clause:	MSPO 2530 Part 3: 4.4.2.2
Area/Process:	Seri Pelangi Estate		
Objective Evidence:	Implementation of the established system for dealing with complaints and grievances that able to resolve disputes in an effective, timely and appropriate manner could be further improved its demonstration of acceptance by parties involved in case of any.		

Noteworthy Positive Comments	
1	Good cooperation by management team/staff/sustainability team
2	Good documentation upkeep and retrieval
3	Good housekeeping at working places e.g. workshop, storage, etc.

3.3 Status of Nonconformities Previously Identified and OFI

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

Opportunity For Improvement			
Ref:	2180631-202203-I1	Clause:	MSPO 2530 Part 3: 4.4.2.3
Area/Process:	Tanarata Estate		
Objective Evidence:	Implementation of the complaint form can be further improved by having consistent recording of response and actions that have been taken by the management.		
Verification Statement:	During ASA 4 on-site assessment visit, it was verified that the established system was to resolve dispute in an effective, timely and appropriate manner, which was accepted by all parties. The time frame to provide feedback to the complainant/stakeholder is documented to be a maximum of 24 days for internal and 30 days for external complaint. Verified the Registry of Complaints book recording all the feedback and request from stakeholders, together with its completion date. Nonetheless, ever since the last assessment, the were no complaints lodged other than for maintenance and house repairs made by workers. Hence, the OFI has been resolved.		

Opportunity For Improvement			
Ref:	2180631-202203-I2	Clause:	MSPO 2530 Part 3: 4.4.4.2
Area/Process:	Tanarata Estate		
Objective Evidence:	<ul style="list-style-type: none"> Mitigation plans and procedures documented and implemented for Platform Manuring Operation could be further aligned accordingly for the hazard and risk related to eye injury. The first aid equipment available at worksites could be further improved on maintaining minimum quantity of content of the equipment been use. The expiry 		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	date stated on the new packing/containers can be improved according to the original packing.
Verification Statement:	<p>During ASA 4 on-site assessment visit, it was verified that 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 operations including Platform Manuring Operation discussed in the HIRARC. Latest review was conducted on 16/03/2021 in Seri Pelangi Estate and on 01/04/2022 in Tanarata Estate. Verified HIRARC of Harvesting, Manuring, Mechanical Harvesting and Spraying.</p> <p>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 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 at Seri Pelangi estate and First Aid Training dated 06/05/2022. Verified training material, photos and first aider interviewed in the field found attend the training as per attendance evidence.</p> <p>Hence, the OFI has been resolved.</p>

Opportunity For Improvement			
Ref:	2180631-202203-I3	Clause:	MSPO 2530 Part 3: 4.4.5.4
Area/Process:	Tanarata Estate		
Objective Evidence:	The checking of pay slips of the employees of contractors can be further improved by reviewing thoroughly the payment details such as paid holiday, etc., against the employment agreements between the contractors and their employees.		
Verification Statement:	<p>During ASA 4 on-site assessment visit, it was verified that Management has ensured employees of contractors are paid based on Minimum Wage Order 2022 requirements as monitoring conducted based on SOP Sustainability Compliance of the Contractors. Sighted Appendix A for monitoring of contractors' workers' pay documents, foreign workers work permits, employment records and workers' legal contributions such as SOCSO and EPF. Sighted monitoring records of contractors as following:</p> <ul style="list-style-type: none"> • SV Thambi Enterprise; FFB Transporter; Agreement ref. # MOA 13623; Date: 1/1/2022 • Usmaj Enterprise; Backhoe operator; Agreement ref. # MOA 13627; Date: 1/1/2022 • Zal Brothers Construction; Replanting land preparation work; Agreement ref. # 13629; Date: 1/1/2022 <p>Hence, the OFI has been resolved.</p>		

Opportunity For Improvement			
Ref:	2180631-202203-I4	Clause:	MSPO 2530 Part 3: 4.4.5.11
Area/Process:	Tanarata Estate		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Objective Evidence:	The awareness among the workers of the subsidized electricity bill (i.e., RM6.54/house/month) can be further improved.
Verification Statement:	During ASA 4, on-site assessment visit, it was verified that the workers have demonstrated their awareness and understanding of the entitlement of subsidized electricity bills of RM6.54/house/month based on the on-site interview conducted. Hence, the OFI has been resolved.

Opportunity For Improvement			
Ref:	2180631-202203-I5	Clause:	MSPO 2530 Part 3: 4.6.4.1
Area/Process:	Tanarata Estate		
Objective Evidence:	The awareness of the legal requirements by the contracted estate's sundry shop can be further improved especially with regards to price tag of goods and sale of gas cylinders.		
Verification Statement:	During ASA 4, on-site assessment visit, it was verified that the estate made their contractors including sundry shop owner understand the MSPO requirements mainly through trainings and meeting. Records of training and meeting were available for verification. The training was done by management during MOU of agreement. Mentioned in the addendum of the contract agreement Clause 10, "The contractor shall adhere to the UP's Company Policies, MSPO and RSPO requirements...." Hence, the OFI has been resolved.		

Opportunity For Improvement			
Ref:	2105176-202109-I1	Clause:	MSPO 2530 Part 3: 4.4.5.3
Area/Process:	Jendarata Estate		
Objective Evidence:	SOCISO contribution for foreign workers which paid by the contractor (Wee Teu Dee) at Jendarata Estate can be appeared/recorded in the contractor workers' payslip since the contribution has been verified as per form 8A. It is to ensure that the workers are aware that they are also covered under SOCISO scheme.		
Verification Statement:	<p>During ASA 4 on-site assessment visit, it was verified that the employees' pay and conditions are based on MAPA/NUPW Agreement on the MAPA/NUPW Harvesters, Harvesting Kanganies, Loaders and Other Loaders on Oil Palm Estates 2019 and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement 2019. It also stated in the work agreement of details of rate for each works which meet the Minimum Wages Order 2022 requirements. Verified work agreement for sample workers as following:</p> <p>Seri Pelangi Estate:</p> <ul style="list-style-type: none"> • Employee # 100357; F; Mandore; Date joined: 1/7/2020 • Employee # 107697; F; GW; Date joined: 1/7/2020 • Employee # 107666; M; Loose Fruit; Date joined: 1/6/2004 • Employee # 106179; M; Loader; Date joined: 29/8/2013 • Employee # 1077752; M; Cutter; Date joined: 4/4/2014 • Employee # 106935; M; Stacker; Date joined: 21/9/2018 • Employee # 107020; F; GW; Date joined: 24/1/2019 		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<ul style="list-style-type: none"> Employee # 107446; M; Cutter; Date joined: 3/8/2019 Employee # 107848; M; Watchman; Date joined: 3/2/2020 Employee # 108263; M; Loose Fruit; Date joined: 1/1/2022 Employee # 108407; M; Cutter; Date joined: 14/5/2022 Employee # 108452; M; Cutter; Date joined: 14/5/2022 <p>Tanarata Estate:</p> <ul style="list-style-type: none"> Employee # 200015; M; GW; Date joined: 13/12/2014 Employee # 200017; M; GW; Date joined: 13/12/2013 Employee # 200034; M; Cutter; Date joined: 8/2/2018 Employee # 200042; M; GW; Date joined: 11/4/2018 Employee # 200051; M; Cutter; Date joined: 23/5/2019 Employee # 200166; M; GW; Date joined: 28/11/2019 Employee # 200193; M; GW; Date joined: 13/9/2021 Employee # 200212; M; GW; Date joined: 20/11/2021 Employee # 200126; M; GW; Date joined: 28/8/2021 <p>Hence, the OFI has been resolved.</p>
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Opportunity For Improvement			
Ref:	2105176-202109-12	Clause:	MSPO 2530 Part 3: 4.3.2.2
Area/Process:	Jendarata Estate		
Objective Evidence:	Information on actual terms of use for the land are available in some land legal ownership documents of Jendarata Estate, however it shall be updated further.		
Verification Statement:	<p>During ASA 4 on-site assessment visit, it was verified that the documents showing legal ownership i.e. land title provided by management as Jendarata POM (Jendarata Engineering Department) located within Jendarata Estate land area as per Land Title # HSD 15113; District: Hilir Perak; Sub-district: Mukim Hutan Melintang; Lot # PT 5135; Area: 416.6 ha.</p> <p>Hence, the OFI has been resolved.</p>		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
1652047-201804-N1	MSPO Part-3: 4.4.5.6 -Minor	26/08/2018	Closed on 17/06/2019
1652047-201804-N2	MSPO Part-3: 4.3.1.1 -Minor	26/08/2018	Closed on 17/06/2019
1652047-201804-N3	MSPO Part-4: 4.3.1.1 -Minor	26/08/2018	Closed on 17/06/2019
1652047-201804-N4	MSPO Part-3: 4.4.4.2 -Minor	26/08/2018	Closed on 17/06/2019
1652047-201804-N5	MSPO Part-4: 4.4.4.2 -Minor	26/08/2018	Closed on 17/06/2019
1782605-201904-N1	MSPO Part-4: 4.3.1.4 -Minor	20/06/2019	Closed on 25/09/2020

MSP0 Public Summary Report
Revision 2 (Nov 2021)

1782605-201904-N2	MSP0 Part-4: 4.5.1.3 -Minor	20/06/2019	Closed on 25/09/2020
1782605-201904-N3	MSP0 Part-3: 4.1.2.2 -Minor	20/06/2019	Closed on 25/09/2020
2213098-202206-N1	MSP0 Part 3: 4.4.4.2 (d) -Minor	16/06/2022	Open

3.5 Issues Raised by Stakeholders

IS #	Description
1	Issues: School Teacher (SJKT Natesa Pillay) Have good relationship with the estate management. The company contributed to school programs. Always invited to attend the stakeholder consultation meeting. Enquiries were responded promptly.
	Management Responses: Noted on positive comments.
	Audit Team Findings: No further issue.
2	Issues: Neighbour Smallholder Company responded to enquiry most of the time verbally upon meeting. Better if respond to written requests in writing too.
	Management Responses: Enquiries or requests by neighbour or local community normally responded by face to face meeting for immediate action of fulfilment. All written enquiries or requests are kept in file. Will consult the enquirer or requester in case of any official response letter required.
	Audit Team Findings: Immediate action by management upon received of written enquiry or requests could be improve further. OFI has been raised under indicator 4.4.2.2.
3	Issues: Neighbour Estate Managers (City Plantations Sdn. Bhd. & MHC Plantations Berhad) Have good relationship with estate management and staff. No issue in boundary or operational matter. Always invited to attend the stakeholder consultation meeting. Enquiries were responded promptly.
	Management Responses: Noted on positive comments.
	Audit Team Findings: No further issue.
4	Issues: Village Representative (Kampung Batu 12) Have good relationship with the estate management. The company contributed to village programs. Always invited to attend the stakeholder consultation meeting. Enquiries were responded promptly. Look forward to cooperating with estate on village program of voluntary firemen service.
	Management Responses: Company willing to assist on the voluntary firemen service for village mainly in training on fire safety and fire extinguishing skill or knowledge. Will conduct a specific consultation with village representative on the matter.
	Audit Team Findings:



MSP0 Public Summary Report
Revision 2 (Nov 2021)

	No further issue.
5	Issues: Vendors (Spare part supplier, Machinery rental contractor, FFB transporter & Shop keeper) Have good relationship with the company management. Prices for purchase orders or contract works given are fair to both parties. Payment of invoices are prompt.
	Management Responses: Noted on positive comments.
	Audit Team Findings: No further issue.
6	Issues: Workers’ representative (Gender committee, Local workers & Foreign workers) Workers have no issue with management. Freedom of association are given to all workers without any interference by company. Good accommodation facilities and amenities provided by company. No issue of harassment including sexual, or violence impose by company in mill and estate operation.
	Management Responses: Noted on positive comments.
	Audit Team Findings: No further issue.

3.6 List of Stakeholders Contacted

Government Officer: School Teacher	Community/neighbouring village: Neighbour Smallholder Neighbour Estate Manager Village Representative
Suppliers/Contractors/Vendors: Spare part supplier Machinery rental contractor FFB transporter Shop keeper	Worker’s Representative/Gender Committee: Gender committee representative Local workers’ representatives Foreign workers’ representatives

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
<p>Based on the findings during the assessment United Plantations Berhad Jendarata Palm Oil Mill (United Plantations Berhad Jendarata Business Unit) Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of United Plantations Berhad Jendarata Business Unit Certification Unit is continued.</p>	
Acknowledgement of Assessment Findings	Report Prepared by
<p>Name: Hafriazhar Mohd. Mokhtar</p>	<p>Name: Lee Kian Wei</p>
<p>Company name: BSI Services Malaysia Sdn. Bhd.</p>	<p>Company name: United Plantations Berhad</p>
<p>Title: Lead Auditor</p>	<p>Title: Sustainability Manager</p>
<p>Signature:</p>  <p>Date: 15/09/2022</p>	<p>Signature:</p>  <p>Date: 16/09/2022</p>

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 a MSPO policy committing to implement on sustainability signed by Chief Executive Director, Dato’ Carl Bek-Nielsen, on 29/3/2018. Latest Jendarata POM re-briefing and training of policies was conducted on 18/5/2022.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment to continual improvement with adherence to key principles as following: <ul style="list-style-type: none"> • Management Commitment and Responsibility • Transparency • Compliance to Legal Requirements • Social Responsibility, Health, Safety and Employment Condition • Environment, Natural Resources, Biodiversity and Ecosystem • Services. • Best Practices • Development of New Plantings 	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for	Internal audit process is documented under Internal Audit Procedure, dated 15/02/2019, revision 1. Annual audit schedule for 2021 was	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	further improvement. - Major compliance -	made available for review. MSPO internal audit was carried out on 18/03/2022 for Seri Pelangi Estate and 07/06/2022 for Tanarata Estate by pool of trained internal audit from HRSS department. Cross department 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. Details of noncompliance has been details in the report. The action plan was submitted to Group Manager HRSS for closure. The findings were closed accordingly.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Internal Audit report are made available for the management verification and it was taken into consideration as part of the management review meeting.	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 for Seri Pelangi Estate and 14/03/2022 for Tanarata Estate. 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. Among agenda in the meeting were: <ol style="list-style-type: none"> 1. Applicable Laws and Regulation – Tracking Laws 2. Business Plan (Annual Budget) 3. Environment Impacts Assessment (EIA) 4. Energy Used (Diesel / Petrol) 5. Schedule waste management 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		6. Social Impacts Assessment (SIA) 7. Stakeholders communication and consultation 8. Internal Audit findings 9. External audit findings 10. Continuous improvement – Quality FFB 11. MSPO / RSPO Internal Audit 2022	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Among continual improvement plan listed for the year 2022 as per the following: Seri Pelangi Estate 1. Use of pesticide – To reduce usage of pesticide by increasing number of IPM plants planted and to reduce herbicide requirements by planting cover crop 2. IPM (Beneficial Plant) – Establishing new IPM plants and educating workers on benefit of IPM plans 3. Barn Owl Boxes – To increase the number of boxes to encourage the increase of occupancy. 4. OSH – To raise awareness on the importance of safety and conduct regular trainings to reduce likelihood of accidents occurring 5. Mechanization – Introduce of mechanized spraying (power spray) to increase productivity in newly mature area. Tanarata Estate	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. Use of pesticide – To reduce usage of pesticide by increasing number of IPM plants planted and to reduce herbicide requirements by planting cover crop 2. IPM (Beneficial Plant) – Establishing new IPM plants and educating workers on benefit of IPM plans 3. Barn Owl Boxes – To install barn owl boxes as soon as the replanting programme is completed to meet 1 box: 12 ha ratio 4. Domestic water usage – To continue educate workers on water saving 	
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>	Provisions were made in the annual and forecast business plans / budgets for the necessary resources including training, to implement the new techniques.	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>	Action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) was established in the estates annual budgets and projected business plans.	Complied
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</p>	United Plantations Berhad had a documented Standard Operation Procedure for both External & Internal Communication. There was also Grievance Redressal procedure which has steps to be followed to solve issues raised by workers/stakeholders. The time frame to provide	Complied

Criterion / Indicator		Assessment Findings	Compliance
	disclosure that could result in negative environmental or social outcomes. - Major compliance -	feedback to the stakeholder is documented to be a maximum of 24 days for internal and 30 days for external complaint. United Plantations Berhad also establish the Stakeholder handbook.	
4.2.1.2	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. - Major compliance -	United Plantations Berhad used the group website for disseminating public information. The Sustainability Report and Group Annual report was available in website. Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estates. In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates' offices and muster ground notice boards for employees and visitors to view. Procedure for complaints and grievances were available through United Plantations Berhad website and medium used was via suggestion box in office or write into United Plantations Berhad head office.	Complied
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	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 of MSPO Principles and Criteria for estate was appointed to embrace and implement the sustainability concepts outlined in the MSPO as per appointment letter below: Seri Pelangi Estate: Mr Khor Boon Wah dated 29/03/2018 Tanarata Estate: Mr Azhar Yazid dated 19/09/2019	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input	Stakeholder's list for Seri Pelangi Estate and Tanarata Estate has been prepared and updated on 10/04/2022 and 18/05/2022 respectively	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	from stakeholders should be properly maintained. - Major compliance -	for the year of 2022. Types of internal and external stakeholders as below: 1. Government bodies 2. Non – Governmental Organization (NGO) 3. Service Providers / Contractors / Suppliers 4. Neighboring community / Plantation / Smallholders 5. Estate community / Estate representative Combined Stakeholders meeting has been conducted on 14/05/2022 at the Lindquist Hall, Jendarata Estate.	
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 -	Internal procedure for traceability has been established in the document title standard operating procedures- traceability revision number 01 and latest revision on 15/2/2019. As per mentioned in the procedure, estate will fill up delivery order mentioning field number, date harvest and name of the harvester and mill provided weigh measurement on daily basis.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspection has been conducted for traceability system during the annual internal audit which has been done on 18/03/2022 by HRSS team for Seri Pelangi Estate. As per internal audit report, there is no findings has been raised related to traceability systems. person that responsible for the issues has been identified.	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 of MSPO Principles and Criteria for estate was appointed to embrace and implement the Traceability in the MSPO as per appointment letter below: Seri Pelangi Estate: Mr Khor Boon Wah dated 29/03/2018	Complied

Criterion / Indicator		Assessment Findings	Compliance																																
		Tanarata Estate: Mr Azhar Yazid dated 19/09/2019																																	
4.2.3.4	Records of sales, delivery or transportation of FFB 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 sample records evidence are as below: Seri Pelangi Estate <table border="1"> <tr> <td>Date</td> <td>19/05/2022</td> <td>17/03/2022</td> <td>10/01/2022</td> </tr> <tr> <td>Receipt No</td> <td>67666</td> <td>66723</td> <td>65649</td> </tr> <tr> <td>Lorry No</td> <td>WYF1491F</td> <td>C206 G38</td> <td>TRSP024</td> </tr> <tr> <td>Weight, MT</td> <td>12.08</td> <td>8.50</td> <td>1.80</td> </tr> </table> Tanarata Estate <table border="1"> <tr> <td>Date</td> <td>21/01/2022</td> <td>30/03/2022</td> <td>27/05/2022</td> </tr> <tr> <td>Receipt No</td> <td>2216</td> <td>2730</td> <td>100</td> </tr> <tr> <td>Lorry No</td> <td>AHD8324</td> <td>AHD8324</td> <td>ALW5766</td> </tr> <tr> <td>Weight, MT</td> <td>4.29</td> <td>7.42</td> <td>14.64</td> </tr> </table>	Date	19/05/2022	17/03/2022	10/01/2022	Receipt No	67666	66723	65649	Lorry No	WYF1491F	C206 G38	TRSP024	Weight, MT	12.08	8.50	1.80	Date	21/01/2022	30/03/2022	27/05/2022	Receipt No	2216	2730	100	Lorry No	AHD8324	AHD8324	ALW5766	Weight, MT	4.29	7.42	14.64	Complied
Date	19/05/2022	17/03/2022	10/01/2022																																
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Lorry No	WYF1491F	C206 G38	TRSP024																																
Weight, MT	12.08	8.50	1.80																																
Date	21/01/2022	30/03/2022	27/05/2022																																
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Lorry No	AHD8324	AHD8324	ALW5766																																
Weight, MT	4.29	7.42	14.64																																
4.3 Principle 3: Compliance to legal requirements																																			
Criterion 4.3.1 – Regulatory requirements																																			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	The estates under the certification unit continued its commitment to comply with applicable legal requirements. Among the licenses and permits verified were: Seri Pelangi Estate <ol style="list-style-type: none"> MPOB Licence No: 502207202000 valid until 31/10/2022 Storage of Diesel, Licence No: A035787 valid until 22/07/2024 Air Compressor No: PK PMT 9858 valid until 16/12/2022 	Complied																																

Criterion / Indicator		Assessment Findings	Compliance
		4. Weighbridge No: B 1298732 valid until 13/01/2023 5. Gun Licence No: 839762 valid until 30/06/2022 Tanarata Estate 1. MPOB Licence No: 618605002000 valid until 31/07/2022 2. Storage of Diesel, Licence No: A004050 valid until 20/08/2024 3. Clinical Waste Management and Disposal No: 006254 valid until 30/04/2023 4. Weighbridge No: 193850131 valid until 29/12/2022 5. TNB Bank Guarantee – 99050BGF638176 valid until 05/09/2022	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	Seri Pelangi Estate and Tanarata 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. 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.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	Seri Pelangi Estate and Tanarata 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	Complied

Criterion / Indicator		Assessment Findings	Compliance
		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. 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 13/06/2022 at Seri Pelangi estate and 16/03/2022 at Tanarata Estate. "Tracking changes in Law" stated on update of Occupational Safety and Health (Amendment) Act 2022.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	The officer-in-charge of MSPO Principles and Criteria for estate was appointed to monitor compliance and to track and update the changes of law and regulation in the MSPO as per appointment letter below: Seri Pelangi Estate: Mr Khor Boon Wah dated 29/03/2018 Tanarata Estate: Mr Azhar Yazid dated 19/09/2019	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	United Plantations Berhad have legal land titles of all estates within Jendarata Business Unit. There is no evidence that the oil palm cultivation activities diminish land use rights of other users. Documents showing legal ownership i.e. land title available as per sample sighted as following: Jendarata Estate: - Title # 587; Lot # 1192; Area: 1.3355 ha - Title # 1396; Lot # 4732; Area: 0.319 ha - Title # 73465; Lot # 2852; Area: 8.7134 ha Seri Pelangi Estate: - Title # 361063; Lot # 7274; Area: 506.90 ha - Title # 1201; Lot # 419; Area: 1.7058 ha	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Title # 361065; Lot # 6099; Area: 403.40 ha Tanarata Estate: <ul style="list-style-type: none"> - Title # 290568; Lot # 7258; Area: 433.2147 ha - Title # 290563; Lot # 7280; Area: 208.0196 ha - Title # 290566; Lot # 7281; Area: 395.0778 ha 	
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>Documents showing legal ownership i.e. land titles provided by management as per sample sighted as following:</p> <p>Jendarata Estate:</p> <ul style="list-style-type: none"> - Title # 587; Lot # 1192; Area: 1.3355 ha - Title # 1396; Lot # 4732; Area: 0.319 ha - Title # 73465; Lot # 2852; Area: 8.7134 ha <p>Seri Pelangi Estate:</p> <ul style="list-style-type: none"> - Title # 361063; Lot # 7274; Area: 506.90 ha - Title # 1201; Lot # 419; Area: 1.7058 ha - Title # 361065; Lot # 6099; Area: 403.40 ha <p>Tanarata Estate:</p> <ul style="list-style-type: none"> - Title # 290568; Lot # 7258; Area: 433.2147 ha - Title # 290563; Lot # 7280; Area: 208.0196 ha - Title # 290566; Lot # 7281; Area: 395.0778 ha 	Complied
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>The estate boundary is demarcated with concrete stone, boundary stones and trenches which is clearly demarcated and visibly maintained by the management.</p> <p>a) Seri Pelangi Estate is neighbouring to Smallholders and MOCCIS Estate. There are 25 concrete poles with GPS coordinates indicating the boundaries in the Estate. Sample taken on the following: -</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		1. P10 LAT 3' 59'5N 101'11'21"E 2. P15 LAT 3' 58'53N 101'13'26" E 3. P25 LAT 3' 58'58" N 101'8'16" E b) Tanarata Estate is adjacent to FELCRA Changkat Jong Estate, MOCCIS Estate and Hilir Oil Palm Sdn Bhd. There are 25 concrete poles with GPS coordinates indicating the boundaries in the Estate. Sample taken on the following: - 1. P1 LAT 3' 58'24N 101'5'45"E 2. P17 LAT 3'57"21 N 101'7'43" E 3. P24 LAT 3'57'7" N 101'11'1" E	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There has been no land dispute lodged by any stakeholders in Jendarata Estate and Tanarata Estate except in Seri Pelangi Estate that has been resolved since last audit. In case of any land dispute, 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
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 are no lands are encumbered by customary rights in all estates within Jendarata Business Unit. In case of any land issue, 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.	NA
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.	There are no lands are encumbered by customary rights in all estates within Jendarata Business Unit. In case of any land issue, the Standard Operating Procedure for Land Dispute Settlement as per Free Prior &	NA

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	Informed Consent (FPIC) – RSPO Principles is documented the process in handling land dispute settlement.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There are no lands are encumbered by customary rights in all estates within Jendarata Business Unit. In case of any land issue, 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.	NA
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 -	<p>SIA based on the latest survey and study conducted on 6/5/2022 and previous Group Review on Social Impacts Assessments conducted on 9/7/2018. Detailed reviews were conducted on each identified social aspect and impacts as following:</p> <ul style="list-style-type: none"> • Access and use rights (Mill located within estate) • Economics livelihood and working conditions • Subsistence activities/amenities • Human rights • Cultural and religious values • Medical & health facilities • Education facilities • Work condition <p>Latest external stakeholder consultation meeting was conducted on 14/5/2022 by Jendarata Business Unit in combination of Jendarata POM, Jendarata Estate, Seri Pelangi Estate and Tanarata Estate at</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Lindquist Hall, Jendarata Estate. The stakeholders dialogue session amongst all attended by neighbouring smallholders, schoolteachers, local community representatives, vendors and authorities etc.</p> <p>Management plans are implemented to mitigate the identified negative impacts and promote the positive ones including feedbacks from the stakeholder consultation meeting.</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>United Plantations Berhad has established internal policy title whistle blower policy which the objective to provide channel for stakeholders to raise concerns and reassurance that they will be protected from reprisal or victimization for whistleblowing.</p> <p>UP Jendarata Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure for grievance handling. Stated in the procedure that complaint received, 4 steps need to be followed which 1st step, 4 days, 2nd step and 3rd step is 7 days.</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>During the on-site consultation with stakeholders, there was feedback that the company responded to enquiry most of the time verbally upon meeting. The stakeholder recommend that it would be better if respond to written requests are in writing too. Verification with the management found that enquiries or requests by neighbour or local community normally responded by face to face meeting for immediate action of fulfilment. All written enquiries or requests are kept in file. Will consult the enquirer or requester in case of any official response letter required.</p> <p>Notwithstanding, implementation of the established system for dealing with complaints and grievances that able to resolve disputes in an</p>	OFI

Criterion / Indicator		Assessment Findings	Compliance
		effective, timely and appropriate manner could be further improved its demonstration of acceptance by parties involved in case of any. Hence, an OFI has been raised on the matter.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	The established system was to resolve dispute in an effective, timely and appropriate manner, which was accepted by all parties. The time frame to provide feedback to the complainant/stakeholder is documented to be a maximum of 24 days for internal and 30 days for external complaint. Verified the Registry of Complaints book recording all the feedback and request from stakeholders, together with its completion date. Nonetheless, ever since the last assessment, there were no complaints lodged other than for maintenance and house repairs made by workers.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	In order to ensure that the procedure is understood aware by employees and surrounding communities, the management has taken initiative to establish handbook which explain the complaint procedure in 6 different languages. It has been confirmed that handbook has been given to all workers.	Complied
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 -	Records of any complaint has been maintained in the form title "stakeholders logbook" which request has been received through verbal, email, meetings and others. Sample has been taken for meeting with foreign workers has been conducted on 14/03/2022 with attendance of workers representative. One of the issues received is one worker requested for new mattress since it has been used for more than 2 years. There is evidence that the request has been responded and inform to the stakeholders.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Contributions made in 2021 recorded in Sustainability Report 2021 with samples include the following:</p> <ul style="list-style-type: none"> • Provision of Hospital and Medicines for Employees, Dependents and Nearby Communities ~ RM 2.8M • Retirement benevolent fund ~ RM 486K • Education, welfare, scholarships and other ~ RM 314K • Bus subsidy for school children ~ RM 88K • External donations ~ RM 307K • New infrastructure – road, TNB and water supply for domestic use RM 197K • Employee housing ~ RM 10.1M • Infrastructure projects, buildings, community halls, places of worship ~ RM 1.9M • Provision of social amenities – 9 primary schools and 7 kindergartens ~ RM 6.1M 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan 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). Latest policy briefing has been conducted on 15/01/2022.</p>	Complied
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</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,</p>	Minor Non-Conformity

Criterion / Indicator	Assessment Findings	Compliance
<p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks 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 pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>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).</p> <p>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.</p> <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</p>	<p>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:</p> <p>Seri Pelangi Estate: 08/06/2022 Tanarata Estate: 18/11/2021</p> <p>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:</p> <p>Seri Pelangi Estate: 16/03/2021 Tanarata Estate: 01/04/2022</p> <p>Verified HIRARC of Harvesting, Manuring, Mechanical Harvesting and Spraying.</p> <p><u>Seri Pelangi Estate</u></p> <p>CHRA Chemical Health Risk Assessment dated 03/03/2021 was conducted by Chemviro Enterprises. The CHRA Report (HQ/13/ASS/00/316-2022/316) was available for verification.</p> <p>Initial Noise Risk Assessment has been conducted at Seri Pelangi Estate dated 20/07/2020. Refer report HQ/07/PEB/00/74-2020/008. The NRA Report was available for verification.</p> <p>Audiometric Test has been conducted on 28/12/2021 by Ansonex Resources Group. A total of 28 employees were tested. Result indicated that there are no workers fall under Abnormal Audiometric Results which is Hearing Impairment, Possible Standard Threshold Shift</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>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>Medical surveillance has been conducted on 09/04/2022 as per recommended by CHRA assessor. Estate Hospital Assistant has monitored on chemical handler in monthly basis. Refer Certificate of Fitness of examined workers dated 15/03/2022.</p> <p><u>Tanarata Estate</u></p> <p>CHRA assessment was conducted by registered Assessor Mrs Hemalatha Tamil Selvan, HQ/13/ASS/00/316 from Chemviro Enterprise dated 16/3/2021.</p> <p>Noise Risk Assessment has been conducted at Tanarata Estate dated 15/03/2022. Refer report HQ/18/PEB/00/00028-2022/017. The NRA Report was available for verification.</p> <p>Audiometric Test has been conducted on 26/02/2021 by Ansonex Resources Group. A total of 8 employees were tested. Result indicated that there are no workers fall under Abnormal Audiometric Results which is Hearing Impairment, Possible Standard Threshold Shift.</p> <p>Medical surveillance has been conducted on 01/03/2022 as per recommended by CHRA assessor. Estate Hospital Assistant has monitored on chemical handler in monthly basis. Refer Certificate of Fitness of examined workers dated 18/03/2022.</p> <p>c) The estates have 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.</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</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>which among others include of pre-entry test for visitors, face mask usage, hand sanitizing, regular disinfecting of workplace, and social distancing.</p> <p>Minor NC</p> <p>The enforcement of PPE usage at harvesting area was not effectively implemented. Thus, Minor non-conformity been raised.</p> <p>During site visit at Seri Pelangi Estate Field No 7, 10 harvesters were interviewed. PPE was given to them and replaced by the management for any damaged PPE. Refer PPE issuance record dated 18/05/2022 found Wellington Boots has been given to the harvester. Training on Harvesting and PPE has been conducted on 18/04/2022 However, 2 harvesters over 10 harvesters (Shuhaq Passport No: EJ0157XXX and Ardi Passport No: AU187XXX were wearing crocs sandals and modified rubber shoes respectively. It was not in line with SOP Harvesting Oil Palm Review 2021 Section 1. Personal Protect Equipment (iii) and HIRARC – Harvesting (Risk Control) dated 16/03/2021.</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 and Malban. Emergency eye wash were checked and functioned in order. Training on handling of chemical has been conducted at Seri Pelangi estate on 22/04/2022 and Tanarata Estate on 08/06/2022.</p> <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</p>	

Criterion / Indicator		Assessment Findings	Compliance																				
		<p>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 for Seri Pelangi Estate and 01/02/2022 for Tanarata Estate.</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"> <thead> <tr> <th rowspan="2">OSH Meeting</th> <th colspan="2">Estate/Date</th> </tr> <tr> <th>Seri Pelangi</th> <th>Tanarata</th> </tr> </thead> <tbody> <tr> <td>1st Meeting 2022</td> <td>17/03/2022</td> <td>30/03/2022</td> </tr> <tr> <td>4th Meeting 2021</td> <td>21/12/2021</td> <td>28/12/2021</td> </tr> <tr> <td>3rd Meeting 2021</td> <td>21/09/2021</td> <td>30/09/2021</td> </tr> <tr> <td>2nd Meeting 2021</td> <td>15/06/2021</td> <td>30/06/2021</td> </tr> <tr> <td>1st Meeting 2021</td> <td>11/03/2021</td> <td>24/03/2021</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 13/04/2022 at Seri Pelangi Estate and 22/04/2022 at Tanarata Estate.</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	Estate/Date		Seri Pelangi	Tanarata	1 st Meeting 2022	17/03/2022	30/03/2022	4 th Meeting 2021	21/12/2021	28/12/2021	3 rd Meeting 2021	21/09/2021	30/09/2021	2 nd Meeting 2021	15/06/2021	30/06/2021	1 st Meeting 2021	11/03/2021	24/03/2021	
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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 at Seri Pelangi estate and First Aid Training dated 06/05/2022. Verified training material, photos and first aider interviewed in the field found attend the training as per attendance evidence.</p> <p>j) Accident records were maintained and updated monthly at the estates.</p> <p>Seri Pelangi Estate</p> <p>There were 2 accidents reported for the year 2021. JKPP 6 report were submitted. The JKPP 8 form have been submitted to DOSH on 22/01/2022 for Seri Pelangi Estate and 24/02/2022 (Due to System Down) for Tanarata Estate with reference number JKPP8/106087/2021 and JKPP8/112863/2022. 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> </tr> <tr> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Seri Pelangi Estate</td> <td>2</td> <td>193</td> </tr> <tr> <td>Tanarata Estate</td> <td>2</td> <td>19</td> </tr> </tbody> </table>	Operating Unit	2021		Cases	Days	Seri Pelangi Estate	2	193	Tanarata Estate	2	19	
Operating Unit	2021													
	Cases	Days												
Seri Pelangi Estate	2	193												
Tanarata Estate	2	19												
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	The management of United Plantations Berhad has established internal policy for human right which has been established on 09/03/2020 and signed by Chief Executive Director. Stated in the policy that, the management of United Plantations Berhad is committed to adhere to	Complied											

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>the fundamental elements of International Labour Organization. The management also commit that all employees, contractors, suppliers, trading partner and others adhered with the policy. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. Verified a sample of latest policy briefing conducted as by management of Seri Pelangi Estate dated on 8/6/2022.</p>	
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>Non-discrimination policy has been established and documented in the document title Gender Policy dated 24/04/2015. Stated in the policy that the management is committed to maintain a workplace free from harassment on any kind of harassment base on employee`s race, colour, religion, gender, national origin and sexual orientations. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages.</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>Employees' pay and conditions are based on MAPA/NUPW Agreement on the MAPA/NUPW Harvesters, Harvesting Kanganies, Loaders and Other Loaders on Oil Palm Estates 2019 and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement 2019. It also stated in the work agreement of details of rate for each works which meet the Minimum Wages Order 2022 requirements. Verified work agreement for sample workers as following:</p> <p>Seri Pelangi Estate:</p> <ul style="list-style-type: none"> • Employee # 100357; F; Mandore; Date joined: 1/7/2020 • Employee # 107697; F; GW; Date joined: 1/7/2020 • Employee # 107666; M; Loose Fruit; Date joined: 1/6/2004 • Employee # 106179; M; Loader; Date joined: 29/8/2013 	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Employee # 1077752; M; Cutter; Date joined: 4/4/2014 Employee # 106935; M; Stacker; Date joined: 21/9/2018 Employee # 107020; F; GW; Date joined: 24/1/2019 Employee # 107446; M; Cutter; Date joined: 3/8/2019 Employee # 107848; M; Watchman; Date joined: 3/2/2020 Employee # 108263; M; Loose Fruit; Date joined: 1/1/2022 Employee # 108407; M; Cutter; Date joined: 14/5/2022 Employee # 108452; M; Cutter; Date joined: 14/5/2022 <p>Tanarata Estate:</p> <ul style="list-style-type: none"> Employee # 200015; M; GW; Date joined: 13/12/2014 Employee # 200017; M; GW; Date joined: 13/12/2013 Employee # 200034; M; Cutter; Date joined: 8/2/2018 Employee # 200042; M; GW; Date joined: 11/4/2018 Employee # 200051; M; Cutter; Date joined: 23/5/2019 Employee # 200166; M; GW; Date joined: 28/11/2019 Employee # 200193; M; GW; Date joined: 13/9/2021 Employee # 200212; M; GW; Date joined: 20/11/2021 Employee # 200126; M; GW; Date joined: 28/8/2021 	
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.	Management has ensured employees of contractors are paid based on Minimum Wage Order 2022 requirements as monitoring conducted based on SOP Sustainability Compliance of the Contractors. Sighted Appendix A for monitoring of contractors' workers' pay documents,	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	foreign workers work permits, employment records and workers' legal contributions such as SOCSO and EPF. Sighted monitoring records of contractors as following: <ul style="list-style-type: none"> • SV Thambi Enterprise; FFB Transporter; Agreement ref. # MOA 13623; Date: 1/1/2022 • Usmaj Enterprise; Backhoe operator; Agreement ref. # MOA 13627; Date: 1/1/2022 • Zal Brothers Construction; Replanting land preparation work; Agreement ref. # 13629; Date: 1/1/2022 	
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	Each estate management established the employee master list where workers information including date of birth, date joined, gender, type of works and others available in details.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	Based on work agreements verified for sample workers in indicator 4.4.5.3 above and interview conducted on-site with them, it was confirmed that fair contracts are provided to all workers and signed by both the workers themselves and the estate management.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	The estate is using the daily check roll system to records the accurate working hours and overtime and recorded in Month To-date Workers Earnings Report.	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations	Time recording at the estates was implemented through recording of check-roll book. The records were updated on daily basis and	Complied

Criterion / Indicator		Assessment Findings	Compliance
	and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	attendance of workers was monitored regularly through field supervision from morning muster until the working time is over.	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Based on pay slips verified for sample workers in indicator 4.4.5.3 above and interview conducted on-site with them, it was confirmed that the wages and overtime payment documented on the pay slips are in line with legal regulations and collective agreements.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	The employees are offered with incentives on output, provided training, access to medical care and other benefits such as free housing, free water supply and electricity supply or reasonable subsidy for water bill and electricity bill given to each worker. Also offered are free education facilities, free childcare and medical services to foreign workers and dependents of local workers.	Complied
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. - Major compliance -	The basic amenities and facilities at the quarters provided by the company to its workers includes electricity, water and domestic waste disposal. Electricity and water are supplied by the government and subsidized by the employer. During the housing visit, it was observed that the housing is in good conditions. 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 persons with 3 bedrooms per house. Line-site inspection record which was updated weekly was available for verification as per sample records of quarters inspection for Seri Pelangi Estate Weekly Inspection of Workers of Staff Quarters, Shophouses & Office/Mill Complex latest on 9/6/2022 by Medical Assistant and Visiting Medical Officer (VMO), Dr. Lee Teik Leong of	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Klinik Lee & Surgery, Teluk Intan; DOSH OHD Reg. # HQ/12/DOC/00/279.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting violence and sexual harassment among all employees. Explanation of the policy was conducted by management to internal stakeholders among workers latest on 14/03/2022.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees 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. - Major compliance -	United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting child labour. Explanation of the policy was conducted by management to internal stakeholders among workers latest on 14/03/2022.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions. - Major compliance -	United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting child labour. Explanation of the policy was conducted by management to internal stakeholders among workers latest on 14/3/2022. All operating units within Jendarata Business Units implemented the company's established Standard Operating Procedures – Recruitment of Guest Workers that selection will be based on age and as per the	Complied

Criterion / Indicator		Assessment Findings	Compliance																																										
		company's policy, the minimum age of employment is 18 years old. For local workers, the company will keep a copy of identification card to verify the age of worker.																																											
Criterion 4.4.6: Training and competency																																													
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	<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>Seri Pelangi Estate</th> <th>Tanarata Estate</th> </tr> </thead> <tbody> <tr> <td>Policy Training</td> <td>08/06/2022</td> <td>18/11/2021</td> </tr> <tr> <td>First Aid Training</td> <td>11/06/2022</td> <td>09/12/2021</td> </tr> <tr> <td>CPR & First Aid Training</td> <td>23/05/2022</td> <td>09/06/2022</td> </tr> <tr> <td>Chemical Handling</td> <td>10/05/2022</td> <td>08/06/2022</td> </tr> <tr> <td>Manuring – Fertilizer Application</td> <td>16/02/2022</td> <td>26/01/2022</td> </tr> <tr> <td>Tractor Operation and Maintenance</td> <td>12/05/2022</td> <td>07/03/2022</td> </tr> <tr> <td>Spraying training and PPE</td> <td>22/04/2022</td> <td>25/05/2022</td> </tr> <tr> <td>Flood Drill Training</td> <td>15/03/2022</td> <td>-</td> </tr> <tr> <td>Fire Drill Training</td> <td>13/04/2022</td> <td>20/05/2022</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>08/03/2022</td> <td>-</td> </tr> <tr> <td>Harvesting Training</td> <td>18/04/2022</td> <td>06/03/2021</td> </tr> <tr> <td>Pre Mixing Training</td> <td>22/04/2022</td> <td>12/08/2021</td> </tr> <tr> <td>Chemical Spillage Training</td> <td>22/04/2022</td> <td>12/08/2021</td> </tr> </tbody> </table>	Training	Seri Pelangi Estate	Tanarata Estate	Policy Training	08/06/2022	18/11/2021	First Aid Training	11/06/2022	09/12/2021	CPR & First Aid Training	23/05/2022	09/06/2022	Chemical Handling	10/05/2022	08/06/2022	Manuring – Fertilizer Application	16/02/2022	26/01/2022	Tractor Operation and Maintenance	12/05/2022	07/03/2022	Spraying training and PPE	22/04/2022	25/05/2022	Flood Drill Training	15/03/2022	-	Fire Drill Training	13/04/2022	20/05/2022	Hearing Conservation Training	08/03/2022	-	Harvesting Training	18/04/2022	06/03/2021	Pre Mixing Training	22/04/2022	12/08/2021	Chemical Spillage Training	22/04/2022	12/08/2021	Complied
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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.	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	Complied																																										

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	the training programme. Among the information available in the form is current job function, skill/knowledge required, present ability, job needed, and training required.	
4.4.6.3	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. - Minor compliance -	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 as 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.	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 in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	United Plantations Berhad has developed Environment & Biodiversity Policy dated on 08/03/2021, endorsed by Dato' Carl Bek-Nelson, Chief Executive Director. The Company are committed to sustainable development through protection of the environment and conservation of biodiversity. Sighted the policy had been translated into Malay language, Bangladeshi, Indian and English Language to accommodate the workers that come from different nation into the Estates. The policy has been communicated to the workers through morning briefing and displayed at various notice boards. The Communication of the OSHA, Biodiversity and Environment Policy Training was conducted on 8/06/2022 to 101 Seri Pelangi workers.	Complied

Criterion / Indicator		Assessment Findings	Compliance												
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>a) United Plantations Berhad has developed Environment & Biodiversity Policy dated on 08/03/2021, endorsed by Dato’ Carl Bek-Nelson, Chief Executive Director.</p> <p>b) United Plantations Berhad have also established Environmental Aspect & Impact Assessment (EAIA) which covers 13 mill activities and operations. The EAIA was reviewed on 14/5/2022 at Seri Pelangi Estate and 15/05/2022 at Tanarata Estate. The document was available for verification for the mill.</p>	Complied												
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>Sighted, Environmental Aspect & Impact Assessment (EAIA) for the year 2022 has been developed and reviewed. The mitigation on the negative impacts and to promote the positive one being recorded under Environmental Management Plan. Sample taken as follows:</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Impact</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>EFB Mulching</td> <td>Soil compaction caused by tractor</td> <td>Use of low ground pressure tires or twin wheels.</td> </tr> <tr> <td>Pest and Disease Management</td> <td>Disposal of used pesticides containers</td> <td>Used pesticides containers to be triple rinsed, punctured to render them neutral/safe and stored in a secure place to be sent to waste manager.</td> </tr> <tr> <td>Weeding</td> <td>Air Pollution from weeding</td> <td>Used pesticides containers to be triple rinsed, punctured to render them neutral/safe and stored in a secure place to be sent to waste manager</td> </tr> </tbody> </table>	Activity	Impact	Action Plan	EFB Mulching	Soil compaction caused by tractor	Use of low ground pressure tires or twin wheels.	Pest and Disease Management	Disposal of used pesticides containers	Used pesticides containers to be triple rinsed, punctured to render them neutral/safe and stored in a secure place to be sent to waste manager.	Weeding	Air Pollution from weeding	Used pesticides containers to be triple rinsed, punctured to render them neutral/safe and stored in a secure place to be sent to waste manager	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The Management have drawn up 6 years Continuous Improvement Plan from year 2021 -2026. The plan as stated herein:</p> <ol style="list-style-type: none"> 1. Reduction in use of pesticide in immature oil palm (herbicides) 2. Reduction in use of pesticide in immature oil palm (insecticides) 3. Reduction in use of pesticide in immature oil palm (fungicides) 4. Reduction in use of pesticide in mature oil palm (herbicides) 5. Reduction in use of pesticide in mature oil palm (insecticides) 6. Reduction in use of pesticide in mature oil palm (fungicides) 7. Integrated Pest Management – Beneficial Plants 8. Barn Owls Boxes 9. Barn owl Box Occupancy rates 	Complied
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p>	<p>An Environmental training program is available in Training Plan updated on a yearly basis. Sample taken as below: -</p> <p>Seri Pelangi Estate</p> <ul style="list-style-type: none"> • Chemical Handling and Spillage Management at Workplace Training dated 10/05/2022 by AEQ Safety Respond and Engineering Training & Consultancy PLT attended by 5 personnel. • Pre- Mixing and washing bay Training dated 22/4/2022 attended by 9 estate personnel <p>Tanarata Estate</p> <ul style="list-style-type: none"> • Chemical Handling and Spillage Management at Workplace Training dated 10/05/2022 by AEQ Safety Respond and Engineering Training & Consultancy PLT attended by 3 personnel • IPM Training dated 17/3/2022 by Estate Sr. Assistant Manager attended by 10 personnel. 	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Environmental meeting has been conducted to Stakeholders as follow: Seri Pelangi Estate</p> <ul style="list-style-type: none"> Environmental meeting was conducted coincide with the OSH Meeting. The last meeting was on 17/3/2022. <p>Tanarata Estate</p> <ul style="list-style-type: none"> Sighted, the Environmental Meeting dated 09/03/2022 attended by 15 external stakeholders. The meeting chaired by DGM, En. Azhar Yazid. The Internal Stakeholder Meeting have been conducted on 18/11/2021 to 91 workers. The meeting chaired by the Assistant Manager. 	Complied																		
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																					
4.5.2.1	<p>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.</p> <p>- Major compliance -</p>	<p>Monthly record of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize use of renewable energy. In view of the Estate being newly taken over, merely 2022 record were available as follows; -</p> <p>a. Diesel</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Seri Pelangi Estate</th> <th>Tanarata Estate</th> </tr> </thead> <tbody> <tr> <td>FFB, mt</td> <td>11,132</td> <td>4,975</td> </tr> <tr> <td>Diesel, liter</td> <td>21,117</td> <td>48,363</td> </tr> <tr> <td>Average Diesel, Liter/mt FFB</td> <td>1.89</td> <td>9.72</td> </tr> </tbody> </table> <p>b. Water</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Seri Pelangi Estate</th> <th>Tanarata Estate</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Description	Seri Pelangi Estate	Tanarata Estate	FFB, mt	11,132	4,975	Diesel, liter	21,117	48,363	Average Diesel, Liter/mt FFB	1.89	9.72	Description	Seri Pelangi Estate	Tanarata Estate				Complied
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Criterion / Indicator		Assessment Findings			Compliance
		FFB, mt	11,132	4,975	
		Water, m3	4,124	1,448	
		Average m3/mt FFB	0.37	0.29	
		c. Electricity			
		Description	Seri Pelangi Estate	Tanarata Estate	
		FFB, mt	11,132	4,975	
		kwh, m3	37,963	26,836	
		Average kwh/mt FFB	3.41	5.39	
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 projection consumption of non-renewable energy for the Estate has been documented on annual basis based on the Financial Year Budget with the latest available is for FY2022			Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No renewable energy be applied at the Estates.			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 -	Standard Operating Procedure on Schedule Waste Management System have been established and the list of waste as follows:			Complied
		Type of waste	Seri Pelangi Estate	Tanarata Estate	
		SW 102		/	
		SW 305	/	/	
		SW 409	/	/	
		SW 410	/	/	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance																								
		SW 110	/																											
		SW 404	/																											
		Sighted monthly report to DOE on scheduled waste is submitted by online @ eswis.doe.gov.com																												
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>a) All Estates have established the Waste Management Plan reviewed on 6/1/2022 at Tanarata Estate and 13/6/2022 at Seri Pelangi Estate. Listed below the waste that have identified and monitoring process at Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Type of waste</th> <th style="width: 15%;">Source of waste</th> <th style="width: 15%;">Method of disposal</th> <th style="width: 55%;">Action Plan to reduce the wastes produced</th> </tr> </thead> <tbody> <tr> <td>Chemical Containers</td> <td>Pesticide and Herbicide drums</td> <td>Sold to waste manager.</td> <td>Increase area for lawn moving and implementation of IPM and barn owl box.</td> </tr> <tr> <td>Fertilizer bags</td> <td>Fertilizer</td> <td>Reuse for loose fruit collection or sold to waste manager</td> <td>EFB Mulching to reduce the usage of inorganic fertilizer.</td> </tr> <tr> <td>Used Filters</td> <td>Tractor</td> <td>Sold to waste manager.</td> <td>Promote the use of buffalos for in-field loading</td> </tr> <tr> <td>Tractor batteries</td> <td>Workshop</td> <td>Sold as scheduled waste to DOE approved waste manager.</td> <td>Monitor the battery periodically and conduct regular maintenance for the tractors</td> </tr> <tr> <td>Domestic waste</td> <td>Workers' Quarters</td> <td>All waste from workers' quarters will be sent to composting pit</td> <td>Educate the workers to practice reusable containers and bags instead of plastic bags</td> </tr> </tbody> </table>				Type of waste	Source of waste	Method of disposal	Action Plan to reduce the wastes produced	Chemical Containers	Pesticide and Herbicide drums	Sold to waste manager.	Increase area for lawn moving and implementation of IPM and barn owl box.	Fertilizer bags	Fertilizer	Reuse for loose fruit collection or sold to waste manager	EFB Mulching to reduce the usage of inorganic fertilizer.	Used Filters	Tractor	Sold to waste manager.	Promote the use of buffalos for in-field loading	Tractor batteries	Workshop	Sold as scheduled waste to DOE approved waste manager.	Monitor the battery periodically and conduct regular maintenance for the tractors	Domestic waste	Workers' Quarters	All waste from workers' quarters will be sent to composting pit	Educate the workers to practice reusable containers and bags instead of plastic bags	OFI
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Criterion / Indicator		Assessment Findings				Compliance
				and segregation work being carried out.		
		b) Improving on the efficiency and recycling mill potential by-products into value-added products are as follows: -				
		Type of waste	Source of waste	Method of disposal	Action Plan to reduce the wastes produced	
		Empty Fruit Bunch	Mill	Fully utilized for field application as mulch	Maximize the fields hectarage covered and reduce the usage of inorganic fertilizers	
		Notwithstanding, the implementation of established Waste Management Plan could be further improved on the efficiency of empty chemical containers reuse activity. Hence, an OFI has been raised.				
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance -	United Plantations Berhad has established Occupational Safety and Health Manual on Safe Use of Pesticides under Chapter IV, Section 11 dated 20/2/2008 by Senior Executive Director, Mr Ho Dua Tiam. The standard operation procedures outline the proper and safe handling of the following details: <ol style="list-style-type: none"> 1. Transport of chemicals 2. Storage & issue of chemicals. 3. Handling of chemicals. 4. Disposal of empty containers and old chemicals. 5. Protective clothing and equipment. 				Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance																																				
		<p>Sighted, Estates disposed their Schedule Waste to the licensed contractor, within the Regulation timeframe of 180 days. The sample taken as follows: -</p> <p>a. Seri Pelangi Estate</p> <table border="1"> <thead> <tr> <th>SW</th> <th>Recent Disposed</th> <th>No of Days and Date Generated Prior To Dispose</th> <th>Previous Disposal</th> <th colspan="2">Consignment Note & Contractor</th> </tr> </thead> <tbody> <tr> <td>410</td> <td>12/3/2022 – 0.0645 Mt</td> <td>17/9/2021 176 days</td> <td>11/9/2021 0.037Mt</td> <td colspan="2">Edsha Solutions Sdn Bhd 20220312114x0Q EG</td> </tr> <tr> <td>110</td> <td>12/3/2022 – 0.0010 Mt</td> <td>17/1/2022 54 days</td> <td>11/9/2021 0.0010 Mt</td> <td colspan="2">Edsha Solutions Sdn Bhd 20220312121DPZ NW</td> </tr> <tr> <td>305</td> <td>12/3/2022 - 0.3800 Mt</td> <td>17/9/2021 176 days</td> <td>11/9/2021 0.4000 Mt</td> <td colspan="2">SP Metro Sdn Bhd 2022031210S1HW 2Q</td> </tr> </tbody> </table> <p>b. Tanarata Estate</p> <table border="1"> <thead> <tr> <th>SW</th> <th>Recent Disposed</th> <th>No of Days and Date Generated Prior To Dispose</th> <th>Previous Disposal</th> <th colspan="2">Consignment Note & Contractor</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td colspan="2"></td> </tr> </tbody> </table>					SW	Recent Disposed	No of Days and Date Generated Prior To Dispose	Previous Disposal	Consignment Note & Contractor		410	12/3/2022 – 0.0645 Mt	17/9/2021 176 days	11/9/2021 0.037Mt	Edsha Solutions Sdn Bhd 20220312114x0Q EG		110	12/3/2022 – 0.0010 Mt	17/1/2022 54 days	11/9/2021 0.0010 Mt	Edsha Solutions Sdn Bhd 20220312121DPZ NW		305	12/3/2022 - 0.3800 Mt	17/9/2021 176 days	11/9/2021 0.4000 Mt	SP Metro Sdn Bhd 2022031210S1HW 2Q		SW	Recent Disposed	No of Days and Date Generated Prior To Dispose	Previous Disposal	Consignment Note & Contractor								
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings					Compliance
		409	30/5/2022 – 0.3457 Mt	13/3/2022 78 days	28/8/2021 0.2000 Mt	Edsha Solutions Sdn Bhd – 2022053011EIL2 JO	
		410	30/5/2022– 0.1225 Mt	19/3/2022 72 days	29/12/2021 – 0.0558mt	Edsha Solutions Sdn Bhd – 20220530116CN R85	
		305	31/3/2022 0.9100 Mt	19/3/2022 12 days	29/12/2021 0.6500 Mt	SP Metro 202203312024Q N08	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance -	Empty chemical container has been disposed as schedule waste under SW 409 at Seri Pelangi Estate. Latest disposal is on 12/3/2022 amounting 0.2258 Mt through Edsha Solutions Sdn Bhd. As for Tanarata Estate, the Empty chemical container has been disposed on 13/3/2022 amounting 0.2357 Mt through Edsha Solutions Sdn Bhd.					Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	The domestic waste from the housing area is well managed and the wastes are disposed at landfill sited at Field 2 of Tanarata Estate and Field 12 of Seri Pelangi Estate. Two (2) workers being assigned to segregate the recyclable items at site.					Complied
Criterion 4.5.4: Reduction of pollution and emission							

Criterion / Indicator		Assessment Findings	Compliance
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 polluting activities has been assessed and documented in the Environmental Impact Assessment. The plan to reduce or minimize the GHG emission has been established and implemented. In general, among the action plans were: - a) To optimize the usage of diesel b) To apply more organic fertilizer such as bunch ash, EFB therefore reducing inorganic fertilizer dependency.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Sighted Environmental Management Plan (EMP), mitigation measures are identified in the Environment Impacts Assessment register to prevent or minimize pollution	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at	Both Estates have established Water Management Plan for the year 2022. The Plan covering the following Area of Management: 1. Peat Soils – to refer to Standard Operating Procedures on cultivation of peat areas. 2. Water for Consumption a) To ensure the water pump house / water drawing facility is maintained in good condition. b) To ensure the pipes / tanks/ valves are not faulty / leaking and that they are repaired / replaced immediately if detected. c) To ensure the correct dosage of water treatments chemicals are added. d) To perform periodic monitoring of the untreated and treated water the treated water shall be subjected to microbial test before being allowed for human consumption.	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																												
	<p>or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>e) To ensure adequate capacity of river / reservoir including that emergency use and to identify alternate water source where possible.</p> <p>f) To monitor the water usage of linesite on monthly basis.</p> <p>3. Domestic Wastewater - to ensure wastewater / effluent drains, pipes and effluent ponds bund is in good condition through periodic checks</p> <p>a) Water usage is monitored on a monthly basis by the Estate and the data has been provided under indicator 4.5.2.1. Water for consumption is from Lembaga Air Perak.</p> <p>b) Seen, water sampling point location map of Tanarata Estate, furnished with legend and its description. Evidence, Water Analysis Report for Tanarata Estate analyzed by UP Research Department, Teluk Intan Perak being taken on 4/6/2021. The result as listed herein:</p> <table border="1"> <thead> <tr> <th>Test Parameter</th> <th>Sungkai River - In</th> <th>Sungkai River - out</th> <th>Sungkai Mati River - In</th> <th>Sungkai Mati River - Out</th> </tr> </thead> <tbody> <tr> <td>Water Source</td> <td>Incoming</td> <td>Outgoing</td> <td>Incoming</td> <td>Outgoing</td> </tr> <tr> <td>pH</td> <td>6.5</td> <td>6.1</td> <td>6.8</td> <td>6.1</td> </tr> <tr> <td>BOD at 30°C (mg/L)</td> <td><2</td> <td><2</td> <td>15</td> <td>6</td> </tr> <tr> <td>COD (mg/L)</td> <td>72</td> <td>61</td> <td>49</td> <td>84</td> </tr> <tr> <td>Suspended Solid (mg/L)</td> <td>307</td> <td>289</td> <td>20</td> <td>15</td> </tr> <tr> <td>Oil & Grease (mg/L)</td> <td>2</td> <td>3</td> <td>4</td> <td>2</td> </tr> <tr> <td>Dissolved O₂ (% Sat)</td> <td>7.8</td> <td>7.4</td> <td>1.0</td> <td>3.8</td> </tr> <tr> <td>NH₃-N (mg/L)</td> <td>0.60</td> <td>0.08</td> <td><0.05</td> <td><0.05</td> </tr> <tr> <td>E.Coli (CFU/mL)</td> <td>24</td> <td>35</td> <td>54</td> <td>7</td> </tr> <tr> <td>Water Quality Index (WQI)</td> <td>52.01</td> <td>55.55</td> <td>56.14</td> <td>58.25</td> </tr> <tr> <td>Water Quality Class</td> <td>III</td> <td>III</td> <td>III</td> <td>III</td> </tr> </tbody> </table>	Test Parameter	Sungkai River - In	Sungkai River - out	Sungkai Mati River - In	Sungkai Mati River - Out	Water Source	Incoming	Outgoing	Incoming	Outgoing	pH	6.5	6.1	6.8	6.1	BOD at 30°C (mg/L)	<2	<2	15	6	COD (mg/L)	72	61	49	84	Suspended Solid (mg/L)	307	289	20	15	Oil & Grease (mg/L)	2	3	4	2	Dissolved O ₂ (% Sat)	7.8	7.4	1.0	3.8	NH ₃ -N (mg/L)	0.60	0.08	<0.05	<0.05	E.Coli (CFU/mL)	24	35	54	7	Water Quality Index (WQI)	52.01	55.55	56.14	58.25	Water Quality Class	III	III	III	III	
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance																																																												
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		<p>e) Not applicable as no natural vegetation in riparian areas has been removed.</p> <p>f) Not applicable as no bore being use for water supply.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	Based on the field observation, sighted no construction of bunds, weirs, and waterways pass through the estate.	Complied
4.5.5.3	<p>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).</p> <p>- Minor compliance -</p>	Water harvesting has been practiced for roadside drain where sandbag weir has been established to collect the water that flow in the roadside drain.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>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:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. 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), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>Environment and biodiversity policy have been established by United Plantations Berhad dated 8th March 2021 and signed by Chief Executive Director, Dato' Carl Bek Nielsen. United Plantations Berhad.</p> <p>1. Seri Pelangi Estate</p> <ul style="list-style-type: none"> No HCV presence in the Estate. However, the Estate did conduct own assessment with participatory of stakeholders dated 10/08/2020. Bengang Canal area is preserved with Sentang trees and planted along the canal. <p>2. Tanarata Estate</p> <ul style="list-style-type: none"> The high biodiversity value was documented in the HCV assessment report being conducted by Sabarinah & Associates Sdn Bhd dated 27-29/10/2021. Based on the summary, no HCV 1,2,3,5,6 is presence in the Estate except for HCV 4 which possibly the river buffer zone. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		HCV Management Plan have been recommended by the Assessor on short-, medium- and long-term basis. Amongst the scope covered are conservation status of flora and fauna, human wildlife conflict, periodical monitoring, pollution waterway, No disturbance to buffer zone, stakeholder engagement and training. The plan being reviewed annually by the Management and the last reviewed was on 04/03/2022.	
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>No rare, threatened, or endangered species found at the Estates. An appropriate measure has been taken by the management such as:</p> <ol style="list-style-type: none"> 1. Displaying proper signage (No Fishing and No Hunting) at strategic locations. 2. Briefing to workers on RTE and Biodiversity in the estate. 3. The estate personnel did conduct HCV / Conservation Area Monitoring Checklist on monthly basis as part of monitoring mechanism. 	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>HCV / Conservation Area Monitoring Checklist have been established, implemented and monitored periodically. The last reviewed at Seri Pelangi Estate was on 02/06/2022 and Tanarata Estate was on 4/3/2022.</p> <p>The estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of fires.</p>	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>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.</p>	<p>Environment and biodiversity policy have been established by United Plantations Berhad dated 08/03/2021 and signed by Chief Executive Director, Dato' Carl Bek Nielsen.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	Not applicable. No significant risk of diseased palm was reported in the estate.	N/A
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 -	Not applicable. No significant risk of diseased palm was reported in the estate.	N/A
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	During replanting process, the old palm to be felled, chipped and shredded and the remains will be left on the inter-row for self-decomposed. Thus, comply with the Company SOPs.	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 -	The United Plantations Berhad has established Standard Operating Procedure Manual dated 26/05/2016. The Standard Operating Procedure of the estate had been kept at the estate in Estate Manual Operation as per details: 1. Nursery operations 2. Replanting 3. Upkeep Mature / Immature weeding 4. Water Management	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>5. Roads & Paths 6. Etc.</p> <p>Furthermore, the Estate has established Safe Operating Procedure for Plantation covering 60 activities c/w HIRARC, for instance: -</p> <ol style="list-style-type: none"> 1. Ablation 2. Pruning 3. Palm census 4. Water gates 5. Workshop 6. Etc. <p>In addition, The United Plantations Berhad has established Standard Operating Procedure Manual on Occupational Safety and Health. The manual covering: -</p> <ol style="list-style-type: none"> 1. Loading and unloading 2. Motor Vehicles 3. Hand and Power Tools 4. Hazardous Chemicals 5. Safe use of pesticides. 	
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of	Based on Topographic Map of Seri Pelangi Estate and Tanarata Estate, the estate is generally flat, 0-2 degree.	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
	either soil, nutrients or chemicals. - Major compliance -																				
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	The estate has a visual reference system to identify each field or block. During site visit, each field has a field stone with block number/year of planting and hectareage.	Complied																		
Criterion 4.6.2: Economic and financial viability plan																					
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Business planning for the period of 2023 - 2025 being established and documented in order to ensure long-term economic and financial viability. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.	Complied																		
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	No replanting programme in next 5 years at Tanarata Estate. As for Seri Pelangi Estate, the replanting programme as follows: - <table border="1" data-bbox="1048 997 1659 1198"> <thead> <tr> <th>Year Replanting</th> <th>Hectarage</th> <th>Field</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>148.00</td> <td>15,12,11</td> </tr> <tr> <td>2023</td> <td>256.00</td> <td>7,8,10</td> </tr> <tr> <td>2024</td> <td>168.00</td> <td>13,14,6</td> </tr> <tr> <td>2025</td> <td>157.00</td> <td>9,5,18,</td> </tr> <tr> <td>2026</td> <td>159.00</td> <td>19,20,21</td> </tr> </tbody> </table>	Year Replanting	Hectarage	Field	2022	148.00	15,12,11	2023	256.00	7,8,10	2024	168.00	13,14,6	2025	157.00	9,5,18,	2026	159.00	19,20,21	Complied
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4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB	The business and management plans were available in the annual budget. The annual budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha	Complied																		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estate performance is recorded in the monthly progress report. Details on the actual vs budget i.e. Upkeep maintenance, capital expenditure are shown therein. The management also provides variance report on the performance and reviewed on a monthly basis. The supervisory personnel maintained a daily cost for the field operations.	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 -	Generally, the pricing mechanism is guided by United Plantations Berhad Tender Policy and Procedures. Briefing to the contractors has been conducted on 30/07/2021 at Seri Pelangi Estate. Based on verification of contract awards and interview with contractors, the implementation of the tender procedure is satisfactorily demonstrated.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Verification of contract agreement, records of payment and interview with contractors showed that contracts was fair, legal and transparent and agreed payments were made in timely manner. The record was available in estate for review.	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.	Both estates have made their contractors understand the MSPO requirements mainly through trainings and meeting. Records of training and meeting were available for verification. The training was done by management during MOU of agreement. Mentioned in the	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	addendum of the contract agreement Clause 10, "The contractor shall adhere to the UP's Company Policies, MSPO and RSPO requirements."	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	All the engaged contractors such as transporters and labour supply were provided with agreed contracts. Verification of the contracts and records of payment showed that the implementation of the stipulated conditions of the contract was effective. Sample of agreement: Seri Pelangi Estate 1. Contractor: SV Thambi Enterprise, Type Of work: External Transport FFB, Period: 01/01/2022 to 31/12/2022 2. Contractor: Selvam Excavator Enterprise, Type Of work: Excavator - Replanting, Period: 01/01/2022 to 31/12/2022 Tanarata Estate 1. Contractor: Chin Lang Contractor Sdn Bhd, Type Of work: Replanting Field No. 3, 12 and 20, Period: 01/01/2022 to 31/12/2022 2. Contractor: GP Rao Enterprise, Type Of work: FFB Transport, Period: 01/01/2022 to 31/12/2022	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 was mentioned in the addendum of the contract agreement Clause 17 "This contractor is subject to any audits including verification by the appointed third-party assurance body".	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 management before any payment is approved. The records of performance evaluation were made available for verification.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
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. - Major compliance -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not applicable as there is no development of new planting in all sample estates.	N/A
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.	Not applicable as there is no development of new planting in all sample estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not applicable as there is no development of new planting in all sample estates.	N/A
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Not applicable as there is no development of new planting in all sample estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not applicable as there is no development of new planting in all sample estates.	N/A

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 a MSPO policy committing to implement on sustainability signed by Chief Executive Director, Dato’ Carl Bek-Nielsen, on 29/3/2018.	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 to continual improvement with the objective of improving the milling operation with adherence to key principles as following: <ul style="list-style-type: none"> • Management Commitment and Responsibility • Transparency • Compliance to Legal Requirements • Social Responsibility, Health, Safety and Employment Condition • Environment, Natural Resources, Biodiversity and Ecosystem • Services. • Best Practices • Development of New Plantings 	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	Internal audit process is documented under Internal Audit Procedure, dated 15/02/2019, revision 1.0 Annual audit schedule for 2022 was made available for review. Jendarata POM and its supply bases was scheduled to have the internal audit on April 2022. MSPO internal	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	audit was carried out on 20/04/2022 by pool of trained internal audit from HRSS 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 20/04/2022. Areas for improvement for site visit were raised for Jendarata POM. The action plan was submitted to Group Manager HRSS for closure. The findings were closed on 04/05/2022 through MSPO and RSPO follow-up internal audit.	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 20/04/2022 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 23/05/2022. 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. Among the agenda in the meeting were: <ol style="list-style-type: none"> 1. Applicable laws and regulations – Tracking of laws 2. Business Plan – Annual Budget 3. Environment Impacts Assessment (EIA) 4. Fossil energy used – diesel use, Renewable energy – Biogas 5. Schedule waste management 6. Social Impacts Assessment (SIA) 7. Stakeholders’ communication and consultation 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		8. Internal audits findings (MSPO, RSPO, SCCS) 9. External Audits (MSPO, RSPO, SCCS) 10. Customer feedback 11. Process performance and product conformity 12. Status of corrections and corrective actions 13. Follow up actions from previous management review 14. Changes that could affect the management system 15. Recommendation for improvement.	
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"> • Mill water usage – to continue to educate workers on water saving • BOD expressed in PPM – maintain the current licence • Dust emission expressed – All boiler must comply to max 150 mg/m³ • Methane gas captured – Target to have 30m³/MT FFB processed for the next 5 years • Litres of spent lubricants dispatched to waste manager – To conduct preventive maintenance and educate drivers on proper care and usage of vehicles • OSHA Safety performance – To raise awareness on the importance of safety and conduct regular trainings to reduce likelihood of accidents occurring 	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 was Mr P. Rajasegaran (Director of Engineering) as per appointment letter dated 13/02/2019 whom is responsible to commit and implement the sustainability concepts outline in MSPO P&Cs, MSPO SCCS, RSPO P&Cs, and RSPO SCCS.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	United Plantations Berhad continued to use the group website for disseminating public information. The Sustainability Report and Group 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.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Procedure for complaints and grievances were available through UP website and medium used are via suggestion box in office or write into UP 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 was Mr P. Rajasegaran (Director of Engineering) as per appointment letter dated 13/02/2019 who is responsible to commit and implement the sustainability concepts outline in MSPO P&Cs, MSPO SCCS, RSPO P&Cs, and RSPO SCCS.	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 Jendarata POM has been prepared and updated on 05/05/2022 for the year of 2022. Types of internal and external stakeholders as below: 1. Government bodies 2. Non – Governmental Organization (NGO) 3. Service Providers / Contractors / Suppliers 4. Neighboring community / Plantation / Smallholders 5. Estate community / Estate representative Stakeholders’ meeting has been conducted on 14/05/2022 at the Lindquist Hall, Jendarata Estate.	Complied
Criterion 4.2.3 – Traceability			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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. - Major compliance -	The company has established two traceability procedures SOP - Traceability dated on 15/02/2019 and SOP for MSPO Supply Chain Model: Segregation dated on 15/02/2019. The objective of this procedure is to outlines the traceability system in the oil palm plantations. For the sales of MSPO certified CPO and PK, the Commodities Department shall ensure the transaction documents for MSPO certified products contains the minimum information as follows: <ul style="list-style-type: none"> • The name and address of the seller/buyer • Products identifications including the supply chain models • The quantity of the products delivered • The loading delivery date • Related transportation documentation with a unique identification number • MSPO certificate number • MSPO certificate validity 	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	HRSS team conducted the inspection on compliance with the established traceability system, as per guided in the SOP – Traceability. Records for daily and monthly inspection were made available to the audit team to verify.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The officer-in-charge for mill was Mr P. Rajasegaran (Director of Engineering) as per appointment letter dated 13/02/2019 whom is responsible to commit and implement the sustainability concepts outline in MSPO P&Cs, MSPO SCCS, RSPO P&Cs, and RSPO SCCS.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel were maintained at the mill.	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																				
	- Major compliance -	<p>Example of sample records evidence are as below:</p> <p>CPO</p> <table border="1"> <tr> <td>Date</td> <td>21/04/2022</td> <td>28/01/2022</td> <td>24/03/2022</td> </tr> <tr> <td>Receipt No</td> <td>71592</td> <td>69685</td> <td>70908</td> </tr> <tr> <td>Lorry No</td> <td>BFB3615</td> <td>WCS5436</td> <td>BFB3615</td> </tr> <tr> <td>Weight, MT</td> <td>39.81</td> <td>29.35</td> <td>30.39</td> </tr> </table> <p>PK</p> <table border="1"> <tr> <td>Date</td> <td>25/05/2022</td> <td>19/04/2022</td> <td>01/03/2022</td> </tr> <tr> <td>Receipt No</td> <td>72370</td> <td>71536</td> <td>70373</td> </tr> <tr> <td>Lorry No</td> <td>KFH9182</td> <td>KFE9182</td> <td>MDB9182</td> </tr> <tr> <td>Weight, MT</td> <td>34.70</td> <td>23.99</td> <td>23.72</td> </tr> </table> <p>FFB</p> <table border="1"> <tr> <td>Estate</td> <td>Lima Blas</td> <td>Seri Pelangi</td> <td>Tanarata</td> </tr> <tr> <td>Date</td> <td>09/06/2022</td> <td>09/06/2022</td> <td>09/06/2022</td> </tr> <tr> <td>Receipt No</td> <td>73131</td> <td>73167</td> <td>73163</td> </tr> <tr> <td>Lorry No</td> <td>BQA3337</td> <td>SB1491</td> <td>AHD8324</td> </tr> <tr> <td>Weight, MT</td> <td>15.52</td> <td>10.58</td> <td>8.05</td> </tr> </table>	Date	21/04/2022	28/01/2022	24/03/2022	Receipt No	71592	69685	70908	Lorry No	BFB3615	WCS5436	BFB3615	Weight, MT	39.81	29.35	30.39	Date	25/05/2022	19/04/2022	01/03/2022	Receipt No	72370	71536	70373	Lorry No	KFH9182	KFE9182	MDB9182	Weight, MT	34.70	23.99	23.72	Estate	Lima Blas	Seri Pelangi	Tanarata	Date	09/06/2022	09/06/2022	09/06/2022	Receipt No	73131	73167	73163	Lorry No	BQA3337	SB1491	AHD8324	Weight, MT	15.52	10.58	8.05	
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4.3 Principle 3: Compliance to legal requirements																																																							
Criterion 4.3.1 – Regulatory requirements																																																							
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Jendarata POM 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: 508108704000 valid until 31/03/2023 	Complied																																																				

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Diesel Permit: KPDNHEP.TI.600-4/3/96 valid until 17/07/2022 • Weighbridge no 1 (B 1806554 @5000kg x 10kg) valid until 21/03/2023 • Weighbridge no 3 (B 1806593 @80000kg x 10kg) valid until 28/04/2023 • DOE license Compliance Schedule no: 004233 valid until 30/06/2022. Method of disposal, land application. • Certificate of Overhead crane Licence No: PMA 22652 valid until 14/02/2023 • Certificate of Air Receiver PK PMT 1992, valid until 14/02/2023 • Fire certificate from No: APA-CON-1925, valid until 28/04/2023. 	
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>Jendarata POM continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation.</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>Jendarata POM has various mechanisms to ensure the legal requirements are complied with. In LRR format there is a column to report the status of compliance which was utilized to report the compliance status of all the applicable legal requirements. Other information available in the format was document/action plan needed, PIC and frequency of monitoring. For any new changes in</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>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 24/05/2022 "Tracking changes in Law" stated on update of Minimum wages order 2022 (Amendment) Act 2022.</p>	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>The Company Secretary [Mr. C. Mathews (HQ)] will track and update any changes in the law. Among the method or platforms used for tracking are:</p> <ul style="list-style-type: none"> • Internet subscription such as Lawnet.com • News and announcement from statutory bodies and government departments such as SOCSO, EPF, etc • Participation of associations and seminars such as Malayan Agricultural Producers Association (MAPA), Malaysian Palm Oil Association (MPOA) 	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>United Plantations Berhad have legal land titles of all estates within Jendarata Business Unit. There is no evidence that the oil palm cultivation activities diminish land use rights of other users.</p> <p>Documents showing legal ownership i.e. land title available as Jendarata POM (Jendarata Engineering Department) located within Jendarata Estate land area as per Land Title # HSD 15113; District:</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Hilir Perak; Sub-district: Mukim Hutan Melintang; Lot # PT 5135; Area: 416.6 ha.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Documents showing legal ownership i.e. land title provided by management as Jendarata POM (Jendarata Engineering Department) located within Jendarata Estate land area as per Land Title # HSD 15113; District: Hilir Perak; Sub-district: Mukim Hutan Melintang; Lot # PT 5135; Area: 416.6 ha.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Since Jendarata POM located within Jendarata Estate land area, all boundary markers demarcation is by Jendarata Estate as reported in the same criteria in MSPO Part 3 Checklist.	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 has been no land dispute lodged by any stakeholders in Jendarata POM since last audit. In case of any land dispute, 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
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 are no lands are encumbered by customary rights in Jendarata POM. In case of any land issue, 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.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There are no lands are encumbered by customary rights in Jendarata POM. In case of any land issue, the Standard Operating Procedure for Land Dispute Settlement as per Free Prior & Informed Consent	N/A

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		(FPIC) – RSPO Principles is documented the process in handling land dispute settlement.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There are no lands are encumbered by customary rights in Jendarata POM. In case of any land issue, 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.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	SIA based on the latest survey and study conducted on 6/5/2022 and previous Group Review on Social Impacts Assessments conducted on 9/7/2018. Detailed reviews were conducted on each identified social aspect and impacts as following: <ul style="list-style-type: none"> • Access and use rights (Mill located within estate) • Economics livelihood and working conditions • Subsistence activities/amenities • Human rights • Cultural and religious values • Medical & health facilities • Education facilities • Work condition Latest external stakeholder consultation meeting was conducted on 14/5/2022 by Jendarata Business Unit in combination of Jendarata POM, Jendarata Estate, Seri Pelangi Estate and Tanarata Estate at	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Lindquist Hall, Jendarata Estate. The stakeholders dialogue session amongst all attended by neighbouring smallholders, schoolteachers, local community representatives, vendors and authorities etc.</p> <p>Management plans are implemented to mitigate the identified negative impacts and promote the positive ones including feedbacks from the stakeholder consultation meeting.</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>United Plantations Berhad has established internal policy title whistle blower policy which the objective to provide channel for stakeholders to raise concerns and reassurance that they will be protected from reprisal or victimization for whistleblowing.</p> <p>UP Jendarata Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure for grievance handling. Stated in the procedure that complaint received, 4 steps need to be followed which 1st step, 4 days, 2nd step and 3rd step is 7 days.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p>	<p>UP Jendarata Business Unit implemented the company's documented Internal Grievance Redressal Procedure and External Grievance Redressal Procedure for grievance handling. Stated in the procedure that complaint received, 4 steps need to be followed which 1st step, 4 days, 2nd step and 3rd step is 7 days. No dispute in Jendarata POM since last audit.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>The established system was to resolve dispute in an effective, timely and appropriate manner, which was accepted by all parties. The time frame to provide feedback to the complainant/stakeholder is documented to be a maximum of 24 days for internal and 30 days</p>	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		for external complaint. Verified the Registry of Complaints book recording all the feedback and request from stakeholders, together with its completion date. Nonetheless, ever since the last assessment, there were no complaints lodged other than for maintenance and house repairs made by workers.	
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 -	In order to ensure that the procedure is understood aware by employees and surrounding communities, the management has taken initiative to establish handbook which explain the complaint procedure in 6 different languages. It has been confirmed that handbook has been given to all 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 -	Records of any complaint has been maintained in the form title "stakeholders logbook" which request has been received through verbal, email, meetings and others. Sample has been taken for latest DOSH mill inspection visit dated 8/6/2022 requests. There is evidence that the request has been responded and inform to the DOSH accordingly.	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 -	Contributions made in 2021 recorded in Sustainability Report 2021 with samples include the following: <ul style="list-style-type: none"> • Provision of Hospital and Medicines for Employees, Dependents and Nearby Communities ~ RM 2.8M • Retirement benevolent fund ~ RM 486K • Education, welfare, scholarships and other ~ RM 314K • Bus subsidy for school children ~ RM 88K • External donations ~ RM 307K 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • New infrastructure – road, TNB and water supply for domestic use RM 197K • Employee housing ~ RM 10.1M • Infrastructure projects, buildings, community halls, places of worship ~ RM 1.9M • Provision of social amenities – 9 primary schools and 7 kindergartens ~ RM 6.1M 	
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 18/05/2022.</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> <ol style="list-style-type: none"> All employees involved are adequately trained on safe working practices; All precautions attached to products should be properly observed and applied; 	<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

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>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).</p> <p>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 Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>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.</p> <p>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 ant the concerns of employees and any remedial actions taken shall be 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 shall be present at all mill operations. First Aid equipment 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>CHRA report was available for verification. Refer report HQ/15/ASS/00/3-2018/081 dated 31/10/2018. Recommendation by assessor has been monitored by the management.</p> <p>Baseline Noise Risk Assessment has been conducted on 04/03/2022 with report reference number HQ/18/PEB/00/00028-2020/0024.</p> <p>Audiometric test has been conducted on 16/05/2022 by Ansonex Resources Group. 84 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> <p>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 25/05/2022, Basic Understanding SDS Training on 08/03/2022 and HIRARC raining on 04/06/2022.</p> <p>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</p>	

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
		<p>given free by the management and replaced upon request due to damage.</p> <p>e. SOP for chemical handling at the laboratory has been established based on HIRARC. Chemical handling training was conducted on 10/05/2022. SDS were placed at the chemical store and sample checked found that the SDS were up to date and consists of 2 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 09/05/2022.</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"> <thead> <tr> <th>OSH Meeting</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1st Meeting 2022</td> <td>30/03/2022</td> </tr> <tr> <td>4th Meeting 2021</td> <td>27/12/2021</td> </tr> <tr> <td>3rd Meeting 2021</td> <td>29/09/2021</td> </tr> <tr> <td>2nd Meeting 2021</td> <td>30/06/2021</td> </tr> <tr> <td>1st Meeting 2021</td> <td>29/03/2021</td> </tr> </tbody> </table>	OSH Meeting	Date	1 st Meeting 2022	30/03/2022	4 th Meeting 2021	27/12/2021	3 rd Meeting 2021	29/09/2021	2 nd Meeting 2021	30/06/2021	1 st Meeting 2021	29/03/2021	
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<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 09/03/2022. Fire extinguisher checklist has been maintained and latest inspection was carried out on 06/04/2022. Verified through site visit all fire extinguisher were valid.</p> <p>i. First aid kits were available at various stations at the mill. Latest first aid training was conducted on 13/05/2022. Sample of checking found that HA were monitored the contents of First aid in monthly basis.</p> <p>The first aider awareness on identification of all items in the box 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 JKPP form 6, 7 and 8. Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 & 8. 2 accident recorded for the year of 2021 and no accident recorded for the year 2022. JKPP 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 JKPP 6 and JKPP 8 and investigation of the accident was documented.</p> <p>JKPP 6 has been report for the 2 accident cases dated 20/07/2021 and 07/01/2021. Investigation of accident cases has been made by the management and record was maintained. Medical certificate was kept in the individual file. Training has</p>	

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>been given and engineering control has been made for management corrective action.</p> <p>JKKP 8 was submitted to DOSH on 11/01/2022 for 2021 summary of cases with reference number JKKP8/99003/2022. Total loss of work recorded with 665 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.</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>The management of United Plantations Berhad has established internal policy for human right which has been established on 09/03/2020 and signed by Chief Executive Director. Stated in the policy that, the management of United Plantations Berhad is committed to adhere to the fundamental elements of International Labour Organization. The management also commit that all employees, contractors, suppliers, trading partner and others adhered with the policy. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages. Verified a sample of latest policy briefing conducted as by management of Jendarata POM dated on 18/5/2022.</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>Non-discrimination policy has been established and documented in the document title Gender Policy dated 24/04/2015. Stated in the policy that the management is committed to maintain a workplace free from harassment on any kind of harassment base on employee`s race, color, religion, gender, national origin and sexual</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	orientations. Communication of the policy has been done through handbook title "Employee and stakeholder handbook" which has been established in 8 different languages.	
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>- Major compliance -</p>	<p>Employees' pay and conditions are based on MAPA/NUPW Agreement on the MAPA/NUPW Palm Oil Mill Employees Agreement 2019 and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement 2019. It also stated in the work agreement of details of rate for each works which meet the Minimum Wages Order 2022 requirements. Verified work agreement for sample Jendarata POM workers as following:</p> <ul style="list-style-type: none"> • Employee # 10010; M; Carpenter; Date joined: 1/10/1975 • Employee # 10019; F; Tradesmate; Date joined: 13/2/1990 • Employee # 20026; M; Crane Driver; Date joined: 1/12/2013 • Employee # 30020; F; GW; Date joined: 6/12/1989 • Employee # 30373; M; GW; Date joined: 11/5/2015 • Employee # 30428; M; GW; Date joined: 4/1/2017 • Employee # 30444; M; GW; Date joined: 5/7/2017 • Employee # 30493; M; GW; Date joined: 15/10/2018 • Employee # 30524; M; GW; Date joined: 1/10/2019 • Employee # 30586; M; GW; Date joined: 15/4/2022 	Complied
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>No direct or fulltime contractors' workers work in the mill except for few contractors engaged by the mill to deliver mechanical and civil works on occasional basis. Notwithstanding, the mill is ensuring their workers were paid in accordance with the industry minimum standards by obtaining pay slips including the evidence of SOCSO</p>	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		employer’s contribution. Based on samples of pay slips, the employees of the contractors were found to be paid accordingly.	
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	The mill management established the employee master list where workers information including date of birth, date joined, gender, type of works and others available in details.	Complied
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 -	Based on work agreements verified for sample workers in indicator 4.4.5.3 above and interview conducted on-site with them, it was confirmed that fair contracts are provided to all workers and signed by both the workers themselves and the mill management.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	There is thumb print system & face recognition for Jendarata POM to records the accurate working hours and overtime and recorded in Jendarata TMS Master Report. The terms of employment are as per MAPA/NUPW.	Complied
4.4.5.8	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. - Major compliance -	There is thumb print system for Jendarata POM to records the accurate working hours and overtime and recorded in Jendarata TMS Master Report. Overtime assigned was based on mutual agreement between the employee and employer. In case the worker is on leave or absent, it is recorded in the same system.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Based on pay slips verified for sample workers in indicator 4.4.5.3 above and interview conducted on-site with them, it was confirmed that the wages and overtime payment documented on the pay slips are in line with legal regulations and collective agreements.	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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. - Minor compliance -	The employees are offered with incentives on output, provided training, access to medical care and other benefits such as free housing, free water supply and electricity supply or reasonable subsidy for water bill and electricity bill given to each worker. Also offered are free education facilities, free childcare and medical services to foreign workers and dependents of local workers.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The basic amenities and facilities at the quarters provided by the company to its workers includes electricity, water and domestic waste disposal. Electricity and water are supplied by the government and subsidized by the employer. During the housing visit, it was observed that the housing is in good conditions. 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 persons with 3 bedrooms per house. Line-site inspection record which was updated weekly was available for verification as per sample records of quarters inspection as per Jendarata POM Weekly Inspection of Workers of Staff Quarters, Shophouses & Office/Mill Complex latest on 9/6/2022 by Medical Assistant and Visiting Medical Officer (VMO), Dr. Shriram Appalasamy of Klinik Lagenda, Hutan Melintang; DOSH OHD Reg. # HQ/19/DOC/00/00440.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting violence and sexual harassment among all employees. Explanation of the policy was conducted by management to internal stakeholders among workers latest on 14/03/2022.	Complied

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<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 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>United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting child labour.</p> <p>Explanation of the policy was conducted by mill management to workers latest on 18/05/2022.</p>	<p>Complied</p>
<p>4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>United Plantations Berhad has established Human Rights Policy dated 9/3/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting child labour.</p> <p>Explanation of the policy was conducted by management to internal stakeholders among workers latest on 18/05/2022.</p> <p>All operating units within Jendarata Business Units implemented the company's established Standard Operating Procedures – Recruitment of Guest Workers that selection will be based on age and as per the company's policy, the minimum age of employment is 18 years old. For local workers, the company will keep a copy of identification card to verify the age of worker.</p>	<p>Complied</p>
<p>Criterion 4.4.6: Training and competency</p>		
<p>4.4.6.1 All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</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>	<p>Complied</p>

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		Training	Date	
		PPE Training	25/05/2022	
		Basic Understanding SDS Training	08/03/2022	
		Fire Drill Training	09/03/2022	
		Policy Training	18/05/2022	
		LOTO Training	02/06/2022	
		HIRARC (All Stations) Training	04/06/2022	
		CPR & First Aid Training	23/04/2022	
		First Aid Training	13/05/2022	
		Chemical and Oil Spillage Training	10/05/2022	
		AESP Training	04/06/2022	
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	United Plantations Berhad has developed Environment & Biodiversity Policy dated on 08/03/2021, endorsed by Dato' Carl Bek-Nelson,		Complied

Criterion / Indicator		Assessment Findings	Compliance						
	established, effectively communicated and implemented. - Major compliance -	Chief Executive Director. The Company are committed to sustainable development through protection of the environment and conservation of biodiversity. Sighted the policy had been translated into Malay language, Bangladeshi, Indian and English Language to accommodate the workers that come from different nation into the mill. The policy has been communicated to the workers through morning briefing and displayed at various notice boards. The Communication of the Company Policies Training was conducted on 18/05/2022 to all 88 mill workers.							
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 -	a) United Plantations Berhad has developed Environment & Biodiversity Policy dated on 08/03/2021, endorsed by Dato' Carl Bek-Nelson, Chief Executive Director. b) United Plantations Berhad have also established Environmental Aspect & Impact Assessment (EAIA) which covers 13 mill activities and operations. The EAIA was reviewed on 15/05/2022 and was available for verification for the mill.	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 -	Sighted, Environmental Aspect & Impact Assessment (EAIA) for the year 2022 has been developed and reviewed on 15/05/2022. The mitigation on the negative impacts and to promote the positive one being recorded under Environmental Management Plan. Sample taken as follows: - <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Activity</th> <th>Impact</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Engine Room</td> <td>Pollution / Contamination (Leakage of lubricant / fuel)</td> <td>To install proper storing facility & implement good handling method & regular maintenance.</td> </tr> </tbody> </table>	Activity	Impact	Action Plan	Engine Room	Pollution / Contamination (Leakage of lubricant / fuel)	To install proper storing facility & implement good handling method & regular maintenance.	Complied
Activity	Impact	Action Plan							
Engine Room	Pollution / Contamination (Leakage of lubricant / fuel)	To install proper storing facility & implement good handling method & regular maintenance.							

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings			Compliance
		Raw Water Treatment	Chemical spillage into drain & waterways	Proper storage room for chemicals.	
		Biogas Plant	Effluent leaking from digester tank, pipe and treatment pump.	Regular checking on critical parts such as pipe joint and pumps.	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The mill identifies all activities /aspects of the palm oil mill that have impact to the environment. The Management have drawn up 10 years Continuous Improvement Plan from year 2017 -2026. The plan covering Social, Environmental and Occupational Safety Health as stated herein:</p> <ol style="list-style-type: none"> 1. Domestic water usage 2. Water usage in Oil Mill 3. BOD (from final discharge of effluent ponds) 4. Dust emissions 5. Methane gas captured 6. POME production 7. Decanter cake production 8. EFB Usage by Estates 9. Spent batteries dispatched to Waste Manager 10. Spent lubricants dispatched to Waste Manager 11. Spent fuel filters dispatched to Waste Manager 12. Triple rinse chemical containers sent to Waste Manager 13. Petrol Usage by Oil Mill 14. Diesel Usage by Oil Mill 			Complied

Criterion / Indicator		Assessment Findings	Compliance																		
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 -	An Environmental training program is available in Training Plan updated on a yearly basis. Sample taken as below: - 1. Chemical and Oil Spillage Training dated 10/05/2022 by AEQ Safety Respond and Engineering Training & Consultancy PLT attended by 22 mill personnel. 2. Safe usage of Personal Protective Equipment Training (PPE) dated 25/6/2022 attended by 90 mill personnel	Complied																		
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Jendarata POM have discussed environmental related issues in the Environmental Performance Monitoring Committee Meeting that are conducted on a half yearly basis. The latest meeting was on 30/11/2021 chaired by Mill Manager, Mr. G. Padmanathan.	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 -	Monthly record on energy consumption for non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control future improvement. Following is the data for diesel, water and electricity usage 2021 record at Mill: - a. Diesel <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Description</th> <th>2021</th> <th>To date 2022</th> </tr> </thead> <tbody> <tr> <td>FFB, mt</td> <td>147,625.00</td> <td>60,752.00</td> </tr> <tr> <td>Diesel, liter</td> <td>94,307.00</td> <td>31,507.00</td> </tr> <tr> <td>Average Diesel, Liter/mt FFB</td> <td>0.68</td> <td>0.52</td> </tr> </tbody> </table> b. Water <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Description</th> <th>2021</th> <th>To date 2022</th> </tr> </thead> <tbody> <tr> <td>FFB, mt</td> <td>147,625.00</td> <td>60,752.00</td> </tr> </tbody> </table>	Description	2021	To date 2022	FFB, mt	147,625.00	60,752.00	Diesel, liter	94,307.00	31,507.00	Average Diesel, Liter/mt FFB	0.68	0.52	Description	2021	To date 2022	FFB, mt	147,625.00	60,752.00	Complied
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance
		Water, m3	123,213.00	62,224.00		
		Average m3/mt FFB	0.83	1.02		
		c. Electricity				
		Description	2021	To date 2022		
		FFB, mt	147,625.00	60,752.00		
		kwh, m3	5,422,587	2,154,535		
		Average kwh/mt FFB	36.73	35.47		
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 projection consumption of diesel for the Mill has been documented on annual basis based on the Financial Year Budget with the latest available is for FY2022.				Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Sighted biomass and biogas usage as renewable energy at Jendarata POM as follows: -				Complied
			Steam Generation		Ratio Generated	
		Year	FFB Process	Biogas Steam	Biomass Steam	Biogas Steam / FFB
		2021	147,625.00	24,238.00	48,247.00	0.16
		2022	60,751.00	9,233.00	18,280.00	0.15
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 mill has established Standard Operating Procedure on Schedule Waste Management System. The type of waste as follows: - 1. SW 102 – Waste of lead acid batteries in whole or crushed form. 2. SW 305 – Spent lubricant oil 3. SW 305 – Spent hydraulic oil				Complied

Criterion / Indicator		Assessment Findings				Compliance																								
		4. SW 409 – Disposed containers, bags or equipment contaminated with chemicals, pesticides, mineral oil or scheduled waste 5. SW 410 – Rags, plastics, papers or filters contaminated with scheduled wastes Chemical container should be washed triple rinsed & punctured to ensure no chemical left in the container / to avoid usage for domestically purpose.																												
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>a) Jendarata POM have established the Waste Management Plan reviewed on May 2022. Listed below the waste that have identified and monitoring process at mill.</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Source of waste</th> <th>Method of disposal</th> <th>Action Plan to reduce the wastes produced</th> </tr> </thead> <tbody> <tr> <td>Used oil filters and used rags</td> <td>Workshop</td> <td>Sold as scheduled waste to DOE approved waste manager.</td> <td>Regular tractor maintenance and replace with the new tractor if need be.</td> </tr> <tr> <td>Spent lubricating and hydraulic oil</td> <td>Workshop</td> <td>Sold as scheduled waste to DOE approved waste manager.</td> <td>Regular tractor maintenance and replace with the new tractor if need be.</td> </tr> <tr> <td>Chemical Container</td> <td>Mill processing</td> <td>Sold as scheduled waste to DOE approved waste manager.</td> <td>Optimum usage of the chemicals to avoid wastage.</td> </tr> </tbody> </table> <p>b) Improving on the efficiency and recycling mill potential by-products into value-added products are as follows: -</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Source of waste</th> <th>Method of disposal</th> <th>Action Plan to reduce the wastes produced</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				Type of waste	Source of waste	Method of disposal	Action Plan to reduce the wastes produced	Used oil filters and used rags	Workshop	Sold as scheduled waste to DOE approved waste manager.	Regular tractor maintenance and replace with the new tractor if need be.	Spent lubricating and hydraulic oil	Workshop	Sold as scheduled waste to DOE approved waste manager.	Regular tractor maintenance and replace with the new tractor if need be.	Chemical Container	Mill processing	Sold as scheduled waste to DOE approved waste manager.	Optimum usage of the chemicals to avoid wastage.	Type of waste	Source of waste	Method of disposal	Action Plan to reduce the wastes produced					Complied
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Criterion / Indicator		Assessment Findings				Compliance																				
		Empty Fruit Bunch	Mill	Mulching in field to retain the moisture of soil.	Maximise the area of EFB mulching in EFB																					
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>United Plantations Berhad has established Occupational Safety and Health Manual on Safe Use of Pesticides under Chapter IV, Section 11 dated 20/2/2008 by Senior Executive Director, Mr Ho Dua Tiam. The standard operation procedures outline the proper and safe handling of the following details:</p> <ol style="list-style-type: none"> 1. Transport of chemicals 2. Storage & issue of chemicals. 3. Handling of chemicals. 4. Disposal of empty containers and old chemicals. 5. Protective clothing and equipment. <p>Sighted, Jendarata POM disposed their Schedule Waste to the licensed contractor, Kualiti Alam Sdn Bhd within the Regulation timeframe of 180 days. The sample taken as follows: -</p> <table border="1"> <thead> <tr> <th>SW</th> <th>Recent Disposed</th> <th>No of Days and Date Generated Prior To Dispose</th> <th>Previous Disposal</th> <th>Consignment Note & Contractor</th> </tr> </thead> <tbody> <tr> <td>109</td> <td>8/4/2022 – 0.090 Mt</td> <td>26/3/2022 13 days</td> <td>19/7/2021 0.140 Mt</td> <td>Kitaran 2021071913 03X2HI</td> </tr> <tr> <td>306</td> <td>8/6/2022 – 0.0700 Mt</td> <td>1/6/2022 7 days</td> <td>7/4/2022 0.530 Mt</td> <td>SP Metro 2022040717 T1VOZY</td> </tr> <tr> <td>410</td> <td>8/4/2022 – 0.160 Mt</td> <td>1/4/2022 7 days</td> <td>20/12/2021 0.210 Mt</td> <td>Kitaran 2021122015 CYH54R</td> </tr> </tbody> </table>				SW	Recent Disposed	No of Days and Date Generated Prior To Dispose	Previous Disposal	Consignment Note & Contractor	109	8/4/2022 – 0.090 Mt	26/3/2022 13 days	19/7/2021 0.140 Mt	Kitaran 2021071913 03X2HI	306	8/6/2022 – 0.0700 Mt	1/6/2022 7 days	7/4/2022 0.530 Mt	SP Metro 2022040717 T1VOZY	410	8/4/2022 – 0.160 Mt	1/4/2022 7 days	20/12/2021 0.210 Mt	Kitaran 2021122015 CYH54R	Complied
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																								
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	The domestic waste from the housing area is well managed and disposed at designated landfill organized by estate management	Complied																								
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, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>The assessment of polluting activities is identified and documented in the Environmental Impact Analysis Assessment and management plan. From the EIA, it will be evaluated for the impact and any impact will be included in the management plan.</p> <p>Data on the level of Greenhouse gases (GHG) emissions are monitored and compiled on yearly basis through the GHG calculation methodology accepted for RSPO and ISCC GHG calculations and certifications which are analysed. As evidence, sighted the GHG Calculation for Jendarata POM year 2022 using GHG RSPO PalmGHG Calculator, V.3.0.1.</p> <p>Sampled the Isokinetic Stack and Air Emission Monitoring Report by Envosha Sdn Bhd for the Mill Boiler as below: Facility: Stack No 7 Date Reporting: 5/6/2022 and report reference No: RT051/2022/021</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Malaysian Clean Air Regulation</th> </tr> </thead> <tbody> <tr> <td>Dust Concentration (mg/m³)</td> <td>114</td> <td>150</td> </tr> <tr> <td>SO₂ (mg/m³)</td> <td>28</td> <td>500</td> </tr> <tr> <td>NO₂ (mg/m³)</td> <td>56</td> <td>500</td> </tr> <tr> <td>HF (mg /m³)</td> <td>ND (<5)</td> <td>30</td> </tr> <tr> <td>HCL (mg /m³)</td> <td>ND (<1)</td> <td>200</td> </tr> <tr> <td>Hg (mg /m³)</td> <td>ND (<0.1)</td> <td>0.03</td> </tr> <tr> <td>CO (mg /m³)</td> <td>69</td> <td>200</td> </tr> </tbody> </table>	Parameter	Result	Malaysian Clean Air Regulation	Dust Concentration (mg/m ³)	114	150	SO ₂ (mg/m ³)	28	500	NO ₂ (mg/m ³)	56	500	HF (mg /m ³)	ND (<5)	30	HCL (mg /m ³)	ND (<1)	200	Hg (mg /m ³)	ND (<0.1)	0.03	CO (mg /m ³)	69	200	Complied
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MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings			Compliance																											
		Dark Smoke	Not exceeding Chart No 1	Not Darker than No 1																												
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Jendarata POM have established Environmental Aspect & Impact Assessment (EAIA) for the year 2022 and reviewed on 15/05/2022 in order to reduce significant pollutants and emissions.			Complied																											
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	<p>POME is treated by conventional method and sent to Jendarata Estate for land application. The land application area is at Field 61 covering 109.60 hectare. Seen, Mill Effluent and Final Discharge Flowmeter data for year 2022 to date being submitted to Director, Department of Environmental on monthly basis.</p> <p>The final discharge of POME has been analysed by ChemVi Laboratory Sdn Bhd, Shah Alam, Selangor on 12/4/2022 for sample received dated 5/4/2022, Lab report number: LW/0422/0582(3)</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Final Pond</th> <th>Parameter</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.20 @28.0°C</td> <td>30.0°C</td> </tr> <tr> <td>COD, mg/L</td> <td>1845</td> <td></td> </tr> <tr> <td>BOD, mg/L</td> <td>461</td> <td>5,000</td> </tr> <tr> <td>Total Suspended Solid, mg/L</td> <td>392</td> <td></td> </tr> <tr> <td>Oil and Grease, mg/L</td> <td>1</td> <td></td> </tr> <tr> <td>Total Solids, mg/L</td> <td>7824</td> <td></td> </tr> <tr> <td>Ammonical Nitrogen, mg/L</td> <td>96</td> <td></td> </tr> <tr> <td>Total Nitrogen, mg/L</td> <td>200</td> <td></td> </tr> </tbody> </table>			Parameter	Final Pond	Parameter	pH	8.20 @28.0°C	30.0°C	COD, mg/L	1845		BOD, mg/L	461	5,000	Total Suspended Solid, mg/L	392		Oil and Grease, mg/L	1		Total Solids, mg/L	7824		Ammonical Nitrogen, mg/L	96		Total Nitrogen, mg/L	200		Complied
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Criterion 4.5.5: Natural water resources																																
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources	Jendarata POM have established a Water Management Plan for the year 2022. The Plan covering the following Area of Management:			Complied																											

Criterion / Indicator	Assessment Findings	Compliance
<p>(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>	<ul style="list-style-type: none"> 1. Peat Soils – to refer to Standard Operating Procedures on cultivation of peat areas. 2. Water for Consumption <ul style="list-style-type: none"> a) To ensure the water pump house / water drawing facility is maintained in good condition. b) To ensure the pipes / tanks/ valves are not faulty / leaking and that they are repaired / replaced immediately if detected. c) To ensure the correct dosage of water treatments chemicals are added. d) To perform periodic monitoring of the untreated and treated water the treated water shall be subjected to microbial test before being allowed for human consumption. e) To ensure adequate capacity of river / reservoir including that emergency use and to identify alternate water source where possible. f) To monitor the water usage of linesite on monthly basis. 3. Domestic Wastewater - to ensure wastewater / effluent drains, pipes and effluent ponds bund is in good condition through periodic checks <ul style="list-style-type: none"> a) Water usage is monitored on a monthly basis by the mill and the data has been provided under indicator 4.5.2.1. b) Water for consumption is from own water treatment source from Sungai Perak and also from Lembaga Air Perak as back-up or contingency plan. Sighted the water sampling results as below: <ul style="list-style-type: none"> 1. Certificate for Analysis - Date of Sampling: 5/04/2022; Reference Number: LW/0422/0581(2); Laboratory: Chem 	

Criterion / Indicator		Assessment Findings	Compliance																					
		<p>Vi Laboratory Sdn Bhd. The results indicated that all parameters were within the permitted range for Drinking Water Quality.</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Results</th> <th>MOH Guidelines for Water Quality</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>6.49 @ 28.3°C</td> <td>6.5 – 9.0</td> </tr> <tr> <td>Free Residual Cl₂, mg/L</td> <td>0.21</td> <td>0.20</td> </tr> <tr> <td>Aluminium, mg/L</td> <td>0.06</td> <td>0.20</td> </tr> <tr> <td>Turbidity, NTU</td> <td>1.28</td> <td>5</td> </tr> <tr> <td>Escherichia Coli, CFU/100mL</td> <td>ND (<10)</td> <td>ND in 100ml</td> </tr> <tr> <td>Total Coliform</td> <td>ND (<10)</td> <td>ND in 100ml</td> </tr> </tbody> </table> <p>c. Ways to optimize water and nutrient usage to reduce wastage being as follows; -</p> <ul style="list-style-type: none"> - To ensure that the water pump house is maintained in good condition - To ensure that pipes / tanks / valves / are not faulty / leaking and that they are repaired / replaced immediately if detected. - To monitor the domestic water usage on monthly basis 	Parameter	Results	MOH Guidelines for Water Quality	pH	6.49 @ 28.3°C	6.5 – 9.0	Free Residual Cl ₂ , mg/L	0.21	0.20	Aluminium, mg/L	0.06	0.20	Turbidity, NTU	1.28	5	Escherichia Coli, CFU/100mL	ND (<10)	ND in 100ml	Total Coliform	ND (<10)	ND in 100ml	
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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>Not applicable as the POME being discharge as Land Application at Jendarata Estate.</p>	N/A																					
4.6 Principle 6: Best Practices																								

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Standard Operating Procedures (SOPs) in the form of written document for mill were documented and maintained. It covers procedures all operations relayed to the management of the mill. The mill's management process and operations are guided by the following documents: 1. Standard Operating Procedure and Monitoring Records in January 2008. There was standard 22 Standard Operating Procedures available an appropriate language. 2. Safe Operating Procedure dated 20/2/2008 signed by Ho Dua Tiam, Senior Executive Director	Complied
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	Mill has implemented Good Milling Practice (GMP) as per their own SOP's. As evidence, the mill is operating in accordance to Jadual Pematuhan Peraturan Kualiti Alam Sekeliling. Sighted the following practice in the mill; a. Online Environmental Reporting submitted on 18/4/2022 b. Environmental Third-Party Audit Report, Ref No: DPKR/0522/5243 dated 11/5/2022 by DPKR Consults Services.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The 5 Year Business Plan was established for Jendarata POM for a period of FY2021 until FY2025. The Business Plan is reviewed on a yearly basis and covering Crop Projection, Mill Capacity and Projection and detailed expenditure costs.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

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 -	The mill does not purchase FFB from outside UP. In term of purchasing goods & services, there is an SOP on Quotations at Engineering Stores, dated 02/01/2016 is used as guidance. In general practice, quotations will be obtained from several suppliers before proceeding the issuance of Purchase Order which need to be approved by the Director of Engineering.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Verification of contract agreement, records of payment and interview with contractors showed that contracts was fair, legal and transparent and agreed payments were made in timely manner.	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 -	Jendarata POM has made its contractors understand the MSPO requirements mainly through trainings and meeting. Records of training and meeting were available for verification. Refer agreement Messrs Beaucon Construction Sdn Bhd, Type of job: Supply Labour, Materials, Tools and Implements for the construction of New Biogas Plant at Jendarata Estate dated 30/04/2022 with Contract reference no: JED/01-2022. The agreement valid until 10/09/2022. Mentioned in the addendum of the contract agreement Clause 2, "The contractor shall adhere to the UP's Company Policies, MSPO and RSPO requirements."	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Refer agreement Messrs Beaucon Construction Sdn Bhd, Type of job: Supply Labour, Materials, Tools and Implements for the construction of New Biogas Plant at Jendarata Estate dated 30/04/2022 with	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Contract reference no: JED/01-2022. The agreement valid until 10/09/2022. The job commences in May 2022.	
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors was mentioned in the addendum of the contract agreement Clause 9 "This contractor is subject to any audits including verification by the appointed third-party assurance body".	Complied

Appendix C: Location and Field Map



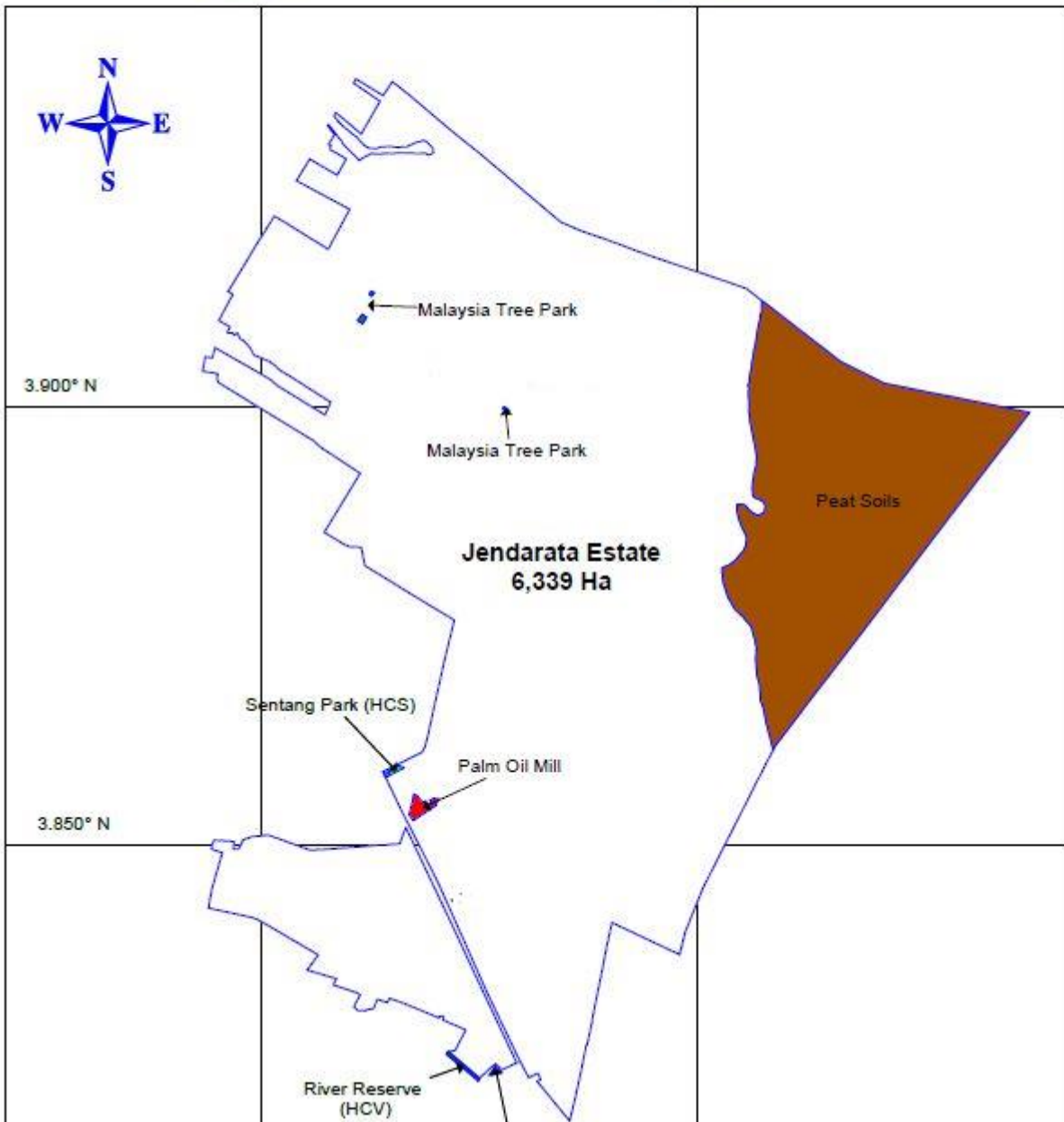
Jendarata Estate Field Map



United Plantations Berhad
Jendarata Estate

100.950° E

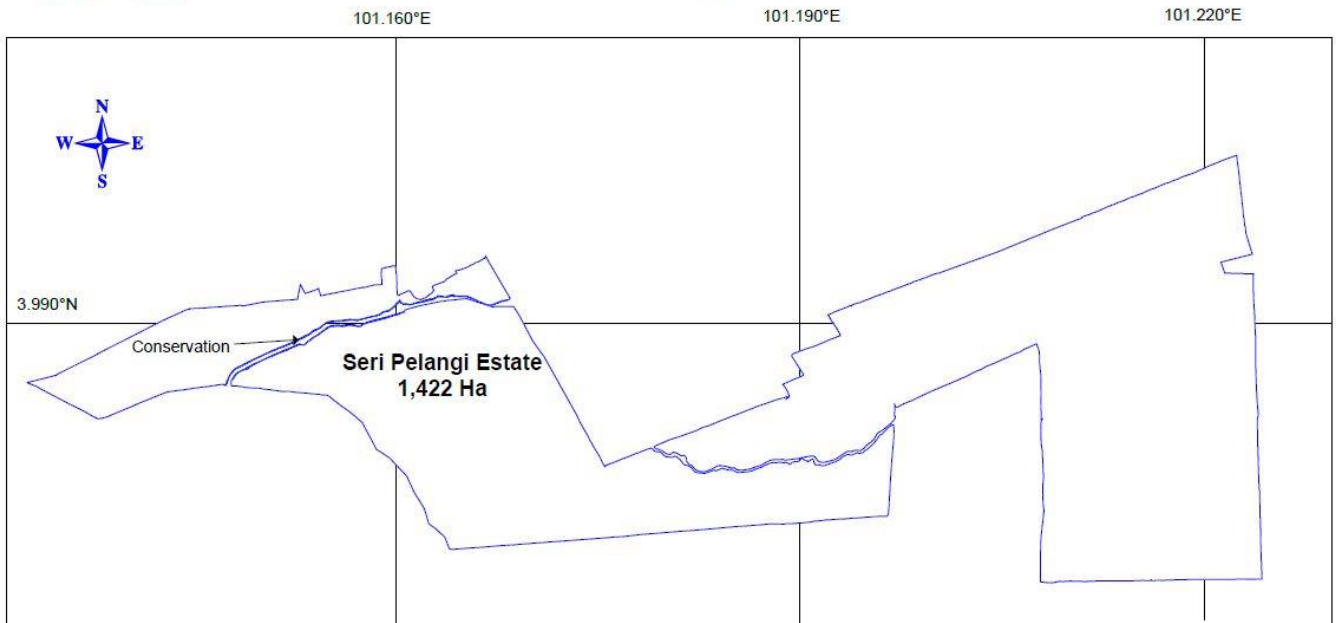
101.000° E



Seri Pelangi Estate Field Map



United Plantations Berhad
Seri Pelangi Estate



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
OFI	Opportunity for Improvement
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