

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (ASA2_3)
- Recertification Assessment
- Extension of Scope

| |
|---|
| Client Company name (Parent Company): United Plantations Berhad |
| Client company Address: Jalan Klang – Teluk Intan, Jendarata Estate 36009 Teluk Intan Perak, Malaysia |
| Certification Unit: Jendarata Palm Oil Mill |
| Location of Certification Unit: Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009 Teluk Intan Perak, Malaysia |

| TABLE of CONTENTS | Page No |
|---|----------------|
| Section 1: Scope of the Certification Assessment..... | 4 |
| 1. Company Details | 4 |
| 2. Certification Information | 4 |
| 3. Other Certifications..... | 4 |
| 4. Location(s) of Mill & Supply Bases | 5 |
| 5. Description of Supply Base..... | 5 |
| 6. Plantings & Cycle..... | 5 |
| 7. Certified Tonnage of FFB (Own Certified Scope) | 6 |
| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | 6 |
| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable..... | 6 |
| 10. Certified Tonnage..... | 6 |
| 11. Actual Sold Volume (CPO)..... | 7 |
| 12. Actual Sold Volume (PK) | 7 |
| 13. Actual Group certification Claims | 7 |
| Section 2: Assessment Process | 8 |
| 2.1 Assessment Methodology, Programme, Site Visits..... | 8 |
| 2.2 BSI Assessment Team: | 10 |
| 2.3 Assessment Plan | 11 |
| Section 3: Assessment Findings | 13 |
| 3.1 Normative requirement applied for this assessment: | 13 |
| 3.2 Multiple Management Units and Time Bound Plan | 13 |
| 3.3 Progress of scheme smallholders and/or outgrowers | 16 |
| 3.4 Details of Nonconformities | 16 |
| 3.4.1 Status of Nonconformities Previously Identified and Observations | 18 |
| 3.4.2 Summary of the Nonconformities and Status..... | 19 |
| 3.5 Stakeholders and previous land owner / user consultation | 19 |
| 3.6 Impartiality and conflict of interest..... | 21 |
| Formal Signing-off of Assessment Conclusion and Recommendation | 22 |
| Appendix A: Summary of Findings | 23 |
| Appendix B: Approved Time Bound Plan..... | 103 |
| Appendix C: GHG Reporting Executive Summary | 105 |
| Appendix D: Supply Chain Declaration..... | 107 |
| Appendix E: Location Map of Certification Unit and Supply bases..... | 112 |

Appendix F: Estate Field Map113
Appendix G: List of Smallholder Sampled.....115
Appendix H: List of Abbreviations116

Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|--|---|---------------------------------|--|
| Parent Company | United Plantations Berhad | | |
| RSPO Membership Number | 1-0004-04-000-00 | Membership Approval Date | 19/07/2004 |
| Address | Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak, Malaysia | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | Jendarata Palm Oil Mill | | |
| Location / Address | Jalan Kuala Selangor – Teluk Intan, Jendarata Estate 36009 Teluk Intan, Perak, Malaysia | | |
| Website | www.unitedplantations.com | | |
| Management Representative | Lee Kian Wei | E-mail | lkw@unitedplantations.com |
| Telephone | 017-6093288 | Facsimile | 05-6417100 |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|------------|
| Certificate Number | RSPO 693200 | Date of First Certification | 21/08/2008 |
| | | Certificate Start Date | 29/09/2017 |
| | | Certificate Expiry Date | 28/09/2022 |
| Scope of Certification | Palm oil and Palm Kernel Production | | |
| Visit Objectives | The objective of the assessment was to conduct annual surveillance assessment to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organization's management system and to confirm the forward strategic plan. | | |
| Applicable Standards | <input type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance | | |

| 3. Other Certifications | | | |
|-------------------------|---|-------------------------------|-------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| MSPO 693204 | MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4 | BSI Services Malaysia Sdn Bhd | 06/09/2023 |
| MSPO 693201 | MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3 | BSI Services Malaysia Sdn Bhd | 06/09/2023 |
| MSPO 709996 | MS SCCS-01 Malaysian Sustainable Palm Oil (MSPO) | BSI Services Malaysia Sdn Bhd | 13/08/2024 |

| 4. Location(s) of Mill & Supply Bases | | | |
|--|---|------------------------|------------------|
| Name (Mill / Supply Base) | Location | GPS Coordinates | |
| | | Latitude | Longitude |
| Jendarata Palm Oil Mill | Jalan Kuala Selangor – Teluk Intan, 36009 Teluk Intan, Perak. | 3°51'14.13" N | 100°58'06.01" E |
| Jendarata Estate | Jalan Klang – Teluk Intan, 36009 Teluk Intan, Perak. | 3°54'00.14" N | 100°58'39.16" E |
| Seri Pelangi Estate | Batu 11 ¾, Jalan Bidor, 36008 Teluk Intan, Perak. | 3°59'37.00" N | 101°09'34.99" E |

| 5. Description of Supply Base | | | | | |
|--------------------------------------|---|---------------------|--|----------------------------|-------------------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Jendarata Estate | 5,286.00 | 3.15 | 1,046.49 | 6335.64 | 83.40 |
| Seri Pelangi Estate | 1,329.00 | 0 | 93.00 | 1,422.00 | 93.46 |
| Total | 6,615.00 | 3.15 | 1,139.49 | 7,757.64 | - |

Remark:
1) Seri Pelangi Estate – 8.00 hectares of planted area converted to nursery (under Infrastructure and other).

| 6. Plantings & Cycle | | | | | | | |
|---------------------------------|--------------------|-----------------|-----------------|----------------|----------------|-----------------|-----------------|
| Estate | Age (Years) | | | | | Mature** | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Jendarata Estate | 1,820.00 | 2,464.80 | 996.90 | 0 | 4.30 | 3,466.00 | 1,820.00 |
| Seri Pelangi Estate | 321.00 | 0 | 484.00 | 453.00 | 71.00 | 1,235.00 | 94.00 |
| Total (ha) | 2,141.00 | 2,464.80 | 1,480.90 | 453.00 | 75.30 | 4,701.00 | 1,914.00 |

Remark:
1) For Seri Pelangi Estate, out of 321.00 ha, only 94.00 ha immature and 227.00 ha have achieved maturity.

| 7. Certified Tonnage of FFB (Own Certified Scope) | | | | |
|--|-------------------------------------|----------------------------------|-----------------------|------------------------------------|
| Estate | Tonnage / year | | | |
| | Estimated (Oct 2019 – Sept 2020) | Actual (June 2019 – Aug 2020) | | Forecast (Oct 2020 – Sept 2021) |
| | | (June 2019 – Sept 2019) | (Oct 2019 – Aug 2020) | |
| Jendarata Estate | 114,600.00 | 37,239.96 | 101,147.61 | 130,000.00 |
| Seri Pelangi Estate | 32,446.00 | 7,605.24 | 22,726.04 | 28,000.00 |
| Total | 147,046.00 | 168,718.85 | | 158,000.00 |

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | | |
|---|-------------------------------------|----------------------------------|--|------------------------------------|
| Estate | Tonnage / year | | | |
| | Estimated (Oct 2019 – Sept 2020) | Actual (June 2019 – Aug 2020) | | Forecast (Oct 2020 – Sept 2021) |
| | | | | |
| N/A | | | | |

| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | | |
|---|-------------------------------------|----------------------------------|--|------------------------------------|
| Independent FFB Supplier | Tonnage / year | | | |
| | Estimated (Oct 2019 – Sept 2020) | Actual (June 2019 – Aug 2020) | | Forecast (Oct 2020 – Sept 2021) |
| | | | | |
| N/A | | | | |

| 10. Certified Tonnage | | | | |
|------------------------------------|-------------------------------------|----------------------------------|--------------------------|------------------------------------|
| | Estimated (Oct 2019 – Sept 2020) | Actual (June 2019 – Aug 2020) | | Forecast (Oct 2020 – Sept 2021) |
| | FFB | FFB | | FFB |
| Mill Capacity: 50 MT/hr | 217,046.00 | (June 2019 – Sept 2019) | (Oct 2019 – Aug 2020) | 158,000.00 |
| | | 44,845.20 | 123,873.65 | |
| SCC Model: IP | CPO (OER: 22.68 %) | CPO(OER: 23.00 %) | CPO(OER: 22.46 %) | CPO (OER: 23.00 %) |
| | 49,240.03 | 10,314.10 | 27,817.83 | 36,340.00 |
| | PK (KER: 5.17 %) | PK (KER: 5.14 %) | PK (KER: 5.14 %) | PK (KER: 5.50 %) |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | |
|---|-----------|----------|----------|----------|
| | 11,452.28 | 2,306.24 | 6,364.69 | 8,690.00 |
| Remarks: Volume of Extension valid until 28/12/2020 FFB: 70,000.00 MT CSPO: 15,890.00 MT CSPK: 3,850.00 MT | | | | |

| 11. Actual Sold Volume (CPO) | | | | | |
|--|----------------|-------------------------|--------|--------------|------------------|
| Current License period (Oct 2019 – Aug 2020) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | 27,428.77 | - | - | 463.39 | 27,892.16 |
| Previous License period (June 2019 – Sept 2019) | | | | | |
| CPO (MT) | 9,725.77 | - | - | 584.33 | 10,310.10 |
| Remark: Opening Stock as of June 2019: 305.67 MT Opening Stock as of October 2019: 309.13MT | | | | | |

| 12. Actual Sold Volume (PK) | | | | | |
|---|----------------|-------------------------|--------|--------------|-----------------|
| Current License period (Oct 2019 – Aug 2020) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| PK (MT) | 6,412.41 | - | - | - | 6,412.41 |
| Previous License period (June 2019 – Sept 2019) | | | | | |
| PK (MT) | 2,355.13 | - | - | - | 2,355.13 |
| Remark: Opening Stock as of June 2019: 375.44 MT Opening Stock as of October 2019: 326.55 MT | | | | | |

| 13. Actual Group certification Claims | | |
|--|--------|----------------------|
| | Credit | Physical Volume (MT) |
| IS-CSPO | N/A | N/A |
| IS-CSPKO | | |
| IS-CSPKE | | |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
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Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 22 – 25 September 2020. The audit programme is included in Section 2.3. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, 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. RSPO Principles & Criteria MYNI 2019 and RSPO Supply Chain Certification Standard 2017 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO 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.

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

| Assessment Program | | | | | |
|--------------------------------------|---|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| Name (Mill / Supply Base) | Year 1 (Re- certification) | Year 2 (ASA 2_1) | Year 3 (ASA 2_2) | Year 4 (ASA 2_3) | Year 5 (ASA 2_4) |
| Jendarata Palm Oil Mill | √ | √ | √ | √ | √ |
| Jendarata Estate | √ | √ | √ | √ | √ |
| Seri Pelangi Estate | √ | √ | √ | √ | √ |

Tentative Date of Next Visit: July 5, 2021 - July 9, 2021

Total No. of Mandays: 9.5 mandays

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

2.2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|-------------------------|---|--|
| Hu Ning Shing | Team Leader | She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages. |
| Hafriazhar Mohd Mokhtar | Team Member | Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. During assessment, he covered the legal issues, social issues, worker's welfare and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages |
| Ragu Samy A Erulappan | Team Member | Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001, ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001, ISO 18001, C-TPAT (Supply Chain Security) and GDPMD (Good Distribution Practice for Medical Devices) Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. For this assessment he assesses Mill and Estate OSH, best practices and legal aspects. He is able to speak and understand Bahasa Malaysia, English and Tamil. |

Accompanying Persons:

| Name | Role |
|------|------|
| N/A | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

2.3 Assessment Plan

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

| Date | Time | Subjects | HNS | HA | RS |
|--|--|---|---|----|----|
| Tuesday, 22/09/2020 Jendarata Palm Oil Mill | 1300 - 1700 | Jendarata Palm Oil Mill RSPO Supply chain requirements for mill (module D: Identity Preserved) - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims | √ | - | - |
| | PM | Auditors travel to VVIP Hotel, Hutan Melintang | √ | √ | √ |
| Wednesday, 23/09/2020 Jendarata Palm Oil Mill | 0830 - 0900 | Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings | √ | √ | √ |
| | 0900 - 1200 | Jendarata Palm Oil Mill Inspection: 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. Visit to laboratory, weighbridge and palm product storage area. | √ | √ | √ |
| | 1000 – 1100 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | √ | - | - |
| | 1200 - 1300 | Lunch | √ | √ | √ |
| | 1300 - 1630 | Jendarata Palm Oil Mill Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. | √ | √ | √ |
| | 1630 - 1700 | Interim Closing Briefing | √ | √ | √ |
| | Thursday, 24/09/2020 Jendarata Estate | 0830 - 1200 | Jendarata Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | √ | √ |
| 1200 – 1300 | | Lunch | √ | √ | √ |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Date | Time | Subjects | HNS | HA | RS |
|---|-------------|--|-----|----|----|
| | 1300 - 1630 | Jendarata Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 1630 - 1700 | Interim Closing Briefing | √ | √ | √ |
| Friday, 25/09/2020 Seri Pelangi Estate | 0830 - 1200 | Seri Pelangi Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc. | √ | √ | √ |
| | 1200 – 1300 | Lunch | √ | √ | √ |
| | 1300 - 1600 | Seri Pelangi Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ |
| | 1600 - 1630 | Verify any outstanding issues & Preparation for closing Meeting | √ | √ | √ |
| | 1630 - 1730 | Closing Meeting | √ | √ | √ |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- United Plantations Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
|--|--|------------|
| Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company? | United Plantations Berhad had certified all of their business units and subsidiaries including – Jenderata POM and supply base; Ulu Basir POM and supply base; United International Enterprises POM and supply base; Ulu Bernam Optimill and supply base; and PT Surya Sawit Sejati (PT SSS) Lada POM and supply base. The remaining plan for certification is the plasma smallholders attached to the PT SSS Lada POM (Plasma Kumai and Arut) and the newly acquired Tanarata Estate (3,642ha) at Teluk Intan, Perak Malaysia on 17 th August 2019. | Yes |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | There was an acquisition for Tanarata Estate on 17th August 2019. In compliance with the RSPO P&C Certification System, United Plantations Berhad anticipate conducting the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years which will be in August 2022. Tanarata Estate will be the supply base of Jendarata Palm Oil Mill (RSPO Identity Preserved model) upon obtaining the RSPO certification. United Plantations Berhad have notified RSPO Membership Department and proceed with the necessary protocols to include Tanarata Estate as an operating unit under United Plantations Berhad. The RSPO certification for plasma smallholders of PT SSS is subject to the issuance of land use certificate (SK Bupati). The timeline on issuance of land use certificate is beyond the control of Company. However, the company declared the plasma smallholders to be certified by 2023 in ACOP 2019. | Yes |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available. | Yes. The date of acquisition for Tanarata Estate is 17th August 2019. In compliance with the RSPO P&C Certification System, United Plantations Berhad anticipate conducting the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years, | Yes |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | which will be in August 2022. Tanarata Estate will be the supply base of Jendarata Palm Oil Mill (RSPO Identity Preserved model) upon obtaining the RSPO certification. | |
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting? | In Malaysia, United Plantations Berhad has newly acquired a piece of uncertified land (3,642ha) in Teluk Intan namely Tanarata Estate. The date of acquisition is 17th August 2019. United Plantations Berhad anticipate conducting the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years, which will be in August 2022. The RSPO certification for plasma smallholders of PT SSS is subject to the issuance of land use certificate (SK Bupati). The timeline on issuance of land use certificate is beyond the control of Company. However, the company declared the scheme smallholders to be certified by 2023 in ACOP 2019. | Yes |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | For the Plasma scheme smallholders in PTSSS is still in preparation process due to land title issuance from the local authority. Full certification is expected by 2023 subject to the issuance of individual land certificates by the local Government. | Yes |
| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised | In Malaysia, United Plantations Berhad has newly acquired a piece of uncertified land (3642ha) in Teluk Intan namely Tanarata Estate. The date of acquisition is 17th August 2019. United Plantations Berhad anticipate conducting the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years, which will be in August 2022. For the Plasma scheme smallholders in PTSSS is still in preparation process due to land title issuance from the local authority. Full certification is expected by 2023 subject to the issuance of individual land certificates by the local Government. | Yes |
| Un-Certified Units or Holdings | | |
| No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. | There is no new replacement of forest in plasma smallholders in PTSSS and Tanarata Estate. | Yes |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | There is no new planting/ land clearing in plasma smallholders in PTSSS and Tanarata Estate after 1 st January 2010. | Yes |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement | There is no any land conflicts reported in both plasma smallholders in PTSSS and Tanarata Estate. Besides, the company has conducted periodic internal audits to | Yes |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | |
|--|--|------------|
| <p>Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> | <p>ensure legal compliance and other time bound criteria for uncertified management units. The company has developed a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form.</p> | |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p> | <p>No major issues reported. Any non-compliance will be addressed through internal audits consistent with the requirements of RSPO P&C criteria.</p> | <p>Yes</p> |
| <p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p> | <p>No major issues reported. Any non-compliance will be addressed through internal audits consistent with the requirements of RSPO P&C criteria.</p> | <p>Yes</p> |
| <p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p> | <p>PT. Surya Sawit Sejati has conducted annual RSPO internal audits from 16-21st March 2020 inclusive of plasma smallholders in PTSSS.</p> <p>The positive assurance statement was made in the internal audit report:</p> <p>The management units under PTSSS have been audited against RSPO P&Cs and the operations are complied with the national legislation and recommend undergoing external audits upon addressing the above findings.</p> <p>United Plantations Berhad have also conducted annual RSPO internal audits for Tanarata Estate on 10th July 2020.</p> <p>The positive assurance statement was made in the internal audit report:</p> <p>The sustainability team has conducted RSPO internal audits and the operations are complied with the national legislation and the upgrading of workers quarters and infrastructures are in progress. United Plantations Berhad has conducted periodic internal audits to ensure legal compliance and other time bound criteria for uncertified management units.</p> | <p>Yes</p> |
| <p>Have there been any stakeholder (including NGO) consultation conducted?</p> | <p>Last meeting was conducted on 18 December 2019 at PT SSS's main office and there is no comments from stakeholders.</p> <p>A combined stakeholder meeting and Consultation Session on Social Impacts Assessment (SIA) & Environment Impacts Assessment (EIA) 2020 for Jendarata Business Unit and Tanarata Estate was conducted on 10/08/2020. No issue was reported during the meeting.</p> | <p>Yes</p> |

3.3 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|-----------------|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | Not applicable. | N/A |

3.4 Details of Nonconformities

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

During this Assessment there were one (1) Non-critical (Minor) nonconformity and one (1) Opportunity for Improvement raised. The Jendarata POM and Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Non-conformity | | | |
|------------------------------------|---|--|---------------------------------|
| NCR Ref # | 1962366-202009-N1 | Clause & Category (Major / Minor) | 3.3.2 (Non-critical - Minor) |
| Date Issued | 25/09/2020 | Due Date | "Next surveillance assessment" |
| Closed (Yes / No) | No | Date of nonconformity Closure | "Next surveillance assessment" |
| Statement of Nonconformity: | The implementation of the procedure was not consistent. | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures is in place. | | |
| Objective Evidence: | a) Jendarata POM: Secondary containment was not provided for sampled liquid chemicals (Hexane, Potassium Iodate & Sulfuric Acid 0.02N) at Laboratory. b) Seri Pelangi Estate: Secondary containment was not provided for the liquid pesticide chemicals stored at the Chemical Store. The above details were not consistent with requirement as per SOP [Chapter IV | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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|-------------------------------|--|
| | Safe Operating Procedure, Section 5: Transportation, Receiving, Handling, Storage and Disposal of Chemicals – clause 6] |
| Corrections: | <p>a)Jendarata POM: The mill management has immediately appointed the lab attendant as person in-charge and placed metal trays as secondary containment for all liquid chemicals at laboratory.</p> <p>b)Seri Pelangi Estate: The Estate management has immediately appointed the store clerk as person in-charge and constructed an embankment to ensure that any leakage of liquid chemicals is confined within the area only.</p> |
| Root Cause Analysis: | The mechanism to monitor the implementation of SOP [Chapter IV Safe Operating Procedure, Section 5: Transportation, Receiving, Handling, Storage and Disposal of Chemicals – clause 6] is ineffective due to no person in-charge been appointed to monitor the implementation of SOP compliance. |
| Corrective Actions: | <p>a)The management will improve the OSHA monthly checklist to monitor the containment wall (embankment)/system (secondary containment tray).</p> <p>b)The management will conduct SOP and OSHA checklist training for the person in-charge and evaluate his understanding in conducting the OSHA monthly monitoring.</p> |
| Assessment Conclusion: | The CAP was accepted and implementation of the CAP will be verified during next assessment. |

| Opportunity for Improvements | |
|-------------------------------------|--|
| OFI # | Description |
| 1962366-202009-I1 | Clause 7.4.3 Implementation of POME land application through furrow system in Jendarata Estate as part of nutrient recycling strategy in place could be strategized further. |

| Positive Findings | |
|--------------------------|---|
| PF # | Description |
| PF 1 | Good commitment and corporation from the management. |
| PF 2 | Positive feedbacks from internal and external stakeholders. |
| PF 3 | Well maintained of the labour quarters. |
| PF 4 | Generally well implementation of Good Agricultural Practices (GAP). |
| PF 5 | Good housekeeping at the Jendarata Engineering Department. |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | |
|------------------------------------|---|--|----------------|
| NCR Ref # | 1790505-201904-N1 | Clause & Category (Major / Minor) | 4.1.2 Minor |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 25/09/2020 |
| Statement of Nonconformity: | The implementation of the procedure was not consistent. | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures shall be in place. | | |
| Objective Evidence: | <ol style="list-style-type: none"> 1. During Boiler Overhaul (Boiler BRB2) on 24 March 2019 and 25 March 2019, the supervisor (contractor) that be a standby person was not competent person as required as per Mill Procedure. 2. During site visit at Jendarata POM, sighted trace of oil at discharge point from monsoon drain to estate drain which was not as per environmental management plan. 3. The emergency response to fire break out at housing complex was not as per documented procedure, "Emergency Response Plan Seri Pelangi Estate" | | |
| Root Cause Analysis: | <ol style="list-style-type: none"> 1. The management did not monitor and ensure the workers who employed by the confined space contractors possess the competent certificate of Authorized Entrance/Standby personnel (AE/SP). 2. The management did not monitor the functionality of oil trap at final discharge point. 3. The management did not revise the frequency of fire drill to correspond with the annual training programme. | | |
| Corrective Actions: | <ol style="list-style-type: none"> 1. The Company will appoint the NIOSH endorsed trainer to conduct in-house training for AE/SP for all staff and workers who involve on work in confine space of all UP's mills. 2. The Sustainability Department will send a self-assessment form to all mills to inform the management to closely monitor the functionality of oil trap especially for the final discharge to waterways. In the event of any oil spillage found, the mill management shall take immediate corrective action to recover the oil spillage and make necessary improvement on the oil trap. 3. The Sustainability Department will send a self-assessment form to all mills and estates to ensure the annual training programme (particularly on fire drill) are conducted twice a year and correspond with the emergency response procedure. | | |
| Assessment Conclusion: | <p>During ASA 3_2 verification, Verified that the proposed corrective action plan has been taken, however there was a reoccurrence of similar statement of nonconformity issues during the current assessment visit indicating the root cause analysis was ineffective addressing the proposed corrective action plan. Thus, this nonconformity was not closed and reissued under the new RSPO P&C 2018 indicator 3.3.2, NCR Ref# 1962366-202009-N1 .</p> | | |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------|--|-------------|--------------------------|
| 2017.01 | Minor | 1.1.1 | 25/05/2017 | Closed out on 26/08/2018 |
| 2017.02 | Minor | 2.2.2 | 27/05/2017 | Closed out on 26/08/2018 |
| 2017.03 | Major | 5.3.2 | 07/04/2017 | Closed out on 29/08/2017 |
| 1650872-201804-M1 | Major | 6.5.2 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M2 | Major | 4.7.3 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M3 | Major | 6.1.1 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M4 | Major | 5.3.2 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M5 | Major | 4.7.4 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M6 | Major | 4.7.2 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M7 | Major | SCCS 5.8.2 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-M8 | Major | RSPO Rules on Market Communication & Claims (version 2016) 4.1 | 27/06/2018 | Closed out on 17/09/2018 |
| 1650872-201804-N1 | Minor | 2.1.3 | 27/06/2018 | Closed out on 20/06/2019 |
| 1790505-201904-N1 | Minor | 4.1.2 | 20/06/2019 | Closed out on 25/09/2020 |
| 1962366-202009-N1 | Minor | 3.3.2 | 25/09/2020 | "Open" |

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Jendarata Palm Oil Mill and Supply Bases Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

| List of Stakeholders contacted | |
|---|---|
| Internal Stakeholders Workers Representatives (Different Nationalities) Gender Representatives | Union/Contractors Neighbouring Plantations/ Smallholders Contractors |
| Government Departments NIL | NGO NIL |

| Stakeholders comment | |
|----------------------|---|
| 1 | Feedbacks: Contractors – They informed that they have sign an agreement with the management beforehand. The payment was made promptly by the management. They are aware and understand the requirements of RSPO. Overall, they have good relationship with the management. |
| | Management Responses: The management will continue to maintain the good relationship with the stakeholders. |
| | Audit Team Findings: No further issue. |
| 2 | Feedbacks: Gender Committee Representatives – They informed that no case of sexual harassment or violence reported during the time of audit. They are aware of their rights. They informed that no discrimination occurred as the management treated all gender equally. There were female workers have been promoted as mandore. |
| | Management Responses: The management will ensure the rights of female workers being protected and respected. |
| | Audit Team Findings: No other issue. |
| 3 | Feedbacks: Workers’ Representatives (Different Nationalities) – They are satisfied with the management as the management has provided free housing facilities to them and well maintained on the buildings. Their wages have achieved Minimum Wage Order 2020 and they will paid according to Employment Act 1955 for any overtime or work done on rest day. They informed that no discrimination occurred in the company as the management treated everyone equally without prejudice. The management has made best effort to ensure the sundry shops have sufficient foods and goods supply during the Movement Control Order period where they are not allowing to travel out. |
| | Management Responses: The management will ensure that they are complying with law and regulations. |
| | Audit Team Findings: No other issue. |
| 4 | Feedbacks: Smallholder/ Neighbouring Plantation - 2 smallholders were invited. One of the smallholders has no issue on land dispute with the company and maintain a good relationship with the management. However, one of the smallholders informed that Seri Pelangi Estate has encroached into his land. |

| | |
|--|---|
| | <p>Management Responses: The management informed that they have land title and GPS coordinate to show that the land is belong to UP Berhad. However, the management is decided to conduct a survey by accredited survey at the said land and at their own cost.</p> |
| | <p>Audit Team Findings: Details refer to Indicator 4.8.1.</p> |



| List of land owner / user contacted | | | | | |
|--|---------------------------|----------------|----------------------|---------------------------------|--|
| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
| Not applicable as the company has acquired and planted since Year 1917 and underwent 4 rounds of replanting. | | | | | |

| Previous land owner / user comment | |
|------------------------------------|----------------------------------|
| | Feedbacks: N/A |
| | Management Responses: N/A |
| | Audit Team Findings: N/A |

3.6 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.

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Formal Signing-off of Assessment Conclusion and Recommendation | |
|---|---|
| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Jendarata Palm Oil Mill and Supply Bases has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Jendarata Palm Oil Mill and Supply Bases is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Hu Ning Shing | Name: Lee Kian Wei |
| Company Name: BSI Services Malaysia Sdn Bhd | Company Name: United Plantations Berhad |
| Title: Lead Auditor | Title: Sustainability Manager |
| Signature:  | Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  |
| Date: 12/10/2020 | Date: 17/10/2020 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|------------|
| Principle 1: Behave ethically and transparently | | |
| Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | |
| 1.1.1 | <p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>United Plantations Berhad has developed a Policy on documents that can be publicly made available dated 11/01/2014 signed by Chief Executive Director. They have listed the documents that are made publicly available as below:</p> <ul style="list-style-type: none"> • Land titles/ user rights • Occupational health and safety plans • Plans and impacts assessments relating to environment and social impacts • HCV documentations • Pollution prevention and reduction plans • Details of complaints and grievances • Negotiation procedures • Continual improvement plans • Public summary of RSPO certification assessment report • Human Rights Policy <p>External stakeholders have been given a copy of Stakeholders’ Booklet which consisted of company’s policies and grievance’s procedure during stakeholder meeting. Besides, briefing of the company’s policies to the external stakeholders during stakeholder meeting last conducted on 10/08/2020.</p> <p>All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company’s website: http://www.unitedplantations.com/. Besides, United Plantations Berhad has</p> | Complied |

| | | | |
|-------|--|--|----------|
| | | participated in Sustainable Palm Oil Transparency Toolkit (SPOTT) assessment to commit to the transparency of companies in public disclosure and commitment. The details can be accessed via https://www.spott.org/palm-oil/united-plantations-bhd/ . | |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance - | All the related information was in Bahasa Malaysia, English and Tamil and are provided to the external stakeholders in the Stakeholders' Booklet or upon request. | Complied |
| 1.1.3 | (C) Records of requests for information and responses are maintained. - Critical (Major) compliance - | Jendarata Engineering Department (JED) has monitored and responded to any requests from all the stakeholders. For e.g.: Headmaster of SJK (T) Ladang Jendarata Bhg 3 has initiated an Internal Repair Requisition to JED to repair the ceiling fan that was not functioning at Year 5' classroom on 09/09/2020. JED has sent the electric charge man to inspect and the repair is still in progress. Jendarata Estate has implemented Registry Record of Requests to record and monitor any request from the stakeholders. Seen one of the requests from SJK (T) Ladang Jendarata 1 to request the management to extend an area with cement for their gardening project on 28/08/2020. The Group Manager of the estate has responded officially on 29/08/2020 to approve the request. Seen the photo evident that the request has been fulfilled. Seri Pelangi Estate has responded to requests from stakeholders as verified through the letter of response from the management. For e.g.: the representative of Hindu temple has written in on 18/07/2020 to request the management to allow them for festival celebration on 31/07/2020 in the temple. The management has responded on 21/07/2020 to approve the event and reminded them to follow the SOP of RMC0. | Complied |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. | United Plantations Berhad has established Grievance Redressal Procedure Internal Stakeholder and External Stakeholder to clear up the misunderstandings/ conflicts/ grievances or raising any issues with United Plantations Berhad. The procedure is adopted in an effective, timely and | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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|---|---|--|----------|
| | - Critical (Major) compliance - | <p>appropriate manner that is open and transparent to any affected parties. The Company Secretary of United Plantations Berhad will be the person responsible to handle all the enquiries and grievances. The time frame to settle the grievances should be not more than 30 days from the date of receipt for external issue and 7 working days for internal issues. The procedure was developed in various languages such as Bahasa Malaysia, English and Tamil and has distributed to the workers and external stakeholders in Stakeholders' Booklet.</p> <p>Director of Engineering, Downstream, Jendarata Engineering Department has been appointed as Officer-In-Charge of RSPO and MSPO P&C at operating unit. Letter of appointment dated 13/02/2019 was available.</p> <p>A combined stakeholder meeting and Consultation Session on Social Impacts Assessment (SIA) & Environment Impacts Assessment (EIA) 2020 for Jendarata Business Unit was conducted on 10/08/2020. Participants from government authorities, contractors, internal workers, neighbouring plantations and local communities' representatives were involved in the meeting. Seen the meeting minutes, attendance list and photo evident.</p> | |
| 1.1.5 | <p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p> | <p>Jendarata Engineering Department and Jendarata Estate has developed Stakeholder List 2021 which has included all relevant internal and external stakeholders such as local communities, government authorities, contractors and suppliers, NGOs and the workers' representatives. Respective nominated representatives and their contact details were clearly stated in the stakeholder list.</p> | Complied |
| Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions. | | | |
| 1.2.1 | <p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p> | <p>United Plantations Berhad has implemented policy on code of ethical conduct and integrity (Code of Conduct and Business Ethics) which covered all operations in the plantation operation. Communication to contractors implemented and recorded as a requirement as per the Memorandum of Agreement issued to contractors. E.g. memorandum of agreement issued with mill operation contractor dated 01/01/2020. Sampled also the memorandum</p> | Complied |

| | | | |
|--|--|--|----------|
| | | of agreement with labour supply contractor with Jendarata Estate dated 01/04/2020 and fruit loading contractor with Seri Pelangi Estate dated 01/01/2020. Briefing session was given to all workers at visited operating units. For example, briefing of policies were given to the mill workers on 12/09/2020, Jendarata Estate worker on 28/02/2020 and Seri Pelangi Estate on 19/8/2020. | |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance - | United Plantation Berhad has a system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. The monitoring mechanism includes Internal Audits by HRESH department and Registered Office Internal Audits. | Complied |
| Principle 2: Operate legally and respect rights | | | |
| Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | | |
| 2.1.1 | (C) The Unit of Certification complies with legal requirements - Critical (Major) compliance - | United Plantations Berhad obtained approval letter from JTK Semenanjung Malaysia Putrajaya to allow them to make deduction on salary with the consent letter from workers. The approval letter with Ref. No.: (6) dlm BHG PU/9/129 dated 01/06/2012. Sampled the Labour Register where the worker has signed on the consent for deductions through check roll for the items below: <ol style="list-style-type: none"> 1. NUPW subscription 2. NUPW insurance 3. Cooking oil 4. Rice 5. Sugar 6. Electricity 7. Cash advance 8. Temple 9. Surau 10. Bakery | Complied |

| | | | |
|--|--|--|--|
| | | <p>Jendarata POM: As per sample sighted as following:</p> <ul style="list-style-type: none"> - MPOB license # 508108704000; Menjual dan Mengalih PK, CPO, SPO #; Membeli dan Mengalih FFB #; Menyimpan PK, CPO, SPO #; Mengilang FFB #; Validity period: 01/04/2020 – 31/03/2021; Max process capacity: 240,000 mt/year - DOE License # 004233 Compliance Schedule Ref. AS(B)A31/152/000/015 Jld. 8 (52); License Period: 01/07/2020 – 30/06/2021; <ul style="list-style-type: none"> i) FFB Processing Capacity: 50 mt/hr ii) Final Discharge: Water Course (10% BOD < 100 mg/l) & Land Application (90% BOD < 5,000 mg/l) iii) Stack Emission < 150 mg/m³ iv) EFB storage 100 m off water course v) Environmental Mainstreaming Tools (EMAINS) 6 monthly vi) Cleaner Production Action plan (Appendix IX) within 3 months from Compliance Schedule date 30/6/2020 - SPAN Fifth Schedule; Form D License Class # SPAN/EKS/(PT)/800-4(1)/15/09 - Form A Permit to Purchase, Store and Use of Sodium Hydroxide # 005907; Solid: 0 kg; Liquid: 6,000 kg NaOH; Date: 01/01/2020; Register # AC0109/2020 - ST Permit Installation # ST(PIP)P/S/PRK/01418; Serial # 009363/2019; Power aggregate: 11.0 kV/9,137.5 kW; Date issued: 02/10/2019 - Electrical Chargeman Acknowledgement # PJ-T-4-B-0011-2019; Serial # PJ 11701905; Category: A4; Restriction: Low Voltage System; Date: 31/01/2019 | |
|--|--|--|--|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <ul style="list-style-type: none"> - (Old) Electrical Chergeman Acknowledgement # PJ-T-3-B-0021-2012; Serial # PJ 1110618; Category: A4-1; Restriction: Low Voltage System (Without Synchronizing Generator); Date: 02/11/2012 - Controlled Schedule Goods Permit Serial # A000136; Ref. # KPDN/BPGK/TIN/PBKB/0096/19; Validity period: 30/10/2019 – 29/10/2020; Max storage volume: <ul style="list-style-type: none"> i) Diesel: 19,600 litres ii) Petrol: 10,800 litres - Competence Certificate Serial # CePSWaM/02020; Competence date: 01/11/2018; Ir. Goh Kheng Wee <p>Jendarata Estate: As per sample sighted as following:</p> <ul style="list-style-type: none"> - MPOB license # 501550502000; Menjual dan Mengalih FFB #; Validity period: 01/04/2020 – 31/03/2021; Area: 5,286 ha; Lot # 871-6416 <p>Seri Pelangi Estate: As per sample sighted as following: MPOB license # 502207202000; Menjual dan Mengalih FFB #; Validity period: 01/11/2020 – 31/10/2021; Area: 1,337 ha; Lot # 7272, 7274, 6099, 419 & 585</p> | |
| 2.1.2 | <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p> | <p>The management continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the UP’s operation. Each office of the operating unit (mill and estates) has its own legal register 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 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| 2.1.3 | <p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p> | <p>Demarcation of boundaries at both visited estates was well maintain especially the boundaries with third parties. A few methods were applied such as concrete pegs white colour (printed info of GPS coordinates), trenches, roads and barb wire fencing. In Jendarata Estate, sighted a sample boundary marker with smallholder at Field # 78 was visible and well maintained.</p> | Complied |
| <p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p> | | | |
| 2.2.1 | <p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p> | <p>A list of contracted parties is maintained accordingly via the Master Record: MOA for Contractors Jendarata Engineering Department. Total 5 contractors listed consist of all contractors e.g. Ha Union Engineering Sdn Bhd. Similarly estates have maintained list of contracted parties adequately. Sampled contractors e.g. Sri Vinagar and BA Engineering Sdn Bhd sampled at the Jendarata Estate and SS Kesavan Enterprise at Seri Pelangi Estate. At the estates the list of contracted parties has been maintained accordingly which includes all contractors including e.g. labour supply contractors and fruit loader.</p> | Complied |
| 2.2.2 | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p> | <p>No third party FFB supply for the mill. All contracts as per the Memorandum of Agreement (MoA) contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. E.g. verified Memorandum of Agreement between United Plantations Berhad (Jendrata Engineering Department) and Ha Union Engineering Sdn Bhd dated 01/01/2020. Contract valid until 31/12/2020. As for estates sampled at Jendarata Estate verified Memorandum of Agreement between United Plantations Berhad (Jendrata Estate) and labour supply contractor – Koh Ker Wee dated 01/04/2020. Contract valid until 31/03/2021. At Seri Pelangi Estate sampled Agreement between SS Kesavan Enterprise (Loader Fruit) and Seri Pelangi Estate dated 01/01/2020. Contract valid until 31/12/2020.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is made available accordingly.</p> | Complied |

| | | | |
|---|--|---|----------|
| 2.2.3 | <p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p> | <p>Jendarata POM processed own cops only and no FFB sourced from third party. Contracts between mill including estates with their respective contractors contain clauses disallowing child, forced and trafficked labour. Example verified Memorandum of Agreement between United Plantations Berhad (Jendrata Engineering Department) and Ha Union Engineering Sdn Bhd dated 01/01/2020. Contract valid until 31/12/2020. As for estates sampled at Jendarata Estate verified Memorandum of Agreement between United Plantations Berhad (Jendrata Estate) and labour supply contractor – Koh Ker Wee dated 01/04/2020. Contract valid until 31/03/2021. At Seri Pelangi Estate sampled Agreement between SS Kesavan Enterprise (Loader Fruit) and Seri Pelangi Estate dated 01/01/2020. Contract valid until 31/12/2020. The contract contains clauses disallowing child, forced and trafficked labour.</p> | Complied |
| <p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p> | | | |
| 2.3.1 | <p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p> | <p>Jendarata POM processed own cops only and no FFB sourced from third party. All FFB sent to Jendarata POM are from own supply base among Jendarata Estate and Seri Pelangi Estate. Nonetheless, United Plantations Berhad as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> | Complied |
| 2.3.2 | <p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p> | <p>This indicator is not applicable since FFB is strictly and only sourced from United Plantations Berhad owned estates.</p> | Complied |
| <p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p> | | | |
| <p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p> | | | |

| 3.1.1 | <p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p> | <ul style="list-style-type: none"> - For mill as per Jendarata Engineering Department Crop Projection for The Year 2017, 2018, 2019, 2020, 2021, 2022 & 2023. Target OER for 2020 22.80% while target KER is 5.2%. For estates as per crop budgets, for Jendarata Estate, Target yield 22 - For Jendarata Estate and Seri Pelangi Estate as per Crop Budget and Cost of Production Per Tonne 2021-2023 | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------|--|---|----------|---------|----------|----------|------|-----|-------|--------|------|-------|-------|--------|------|-----|------|-------|------|------|------|--------|------|----|-------|-------|------|---------|----------|----------|------|---|-------|--------|------|----|-------|--------|------|----|-------|--------|------|---|-------|--------|------|----|-------|--------|----------|
| 3.1.2 | <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p> | <p>For Jendarata Estate as per Jendarata Replanting Programme (Next 5 years) as per sample as following:</p> <table border="1" data-bbox="1010 660 1581 959"> <thead> <tr> <th>Year</th> <th>Field #</th> <th>Hectares</th> <th>Total Ha</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>32B</td> <td>10.90</td> <td>592.32</td> </tr> <tr> <td>2021</td> <td>145AE</td> <td>48.40</td> <td>318.94</td> </tr> <tr> <td>2022</td> <td>90A</td> <td>4.20</td> <td>93.80</td> </tr> <tr> <td>2023</td> <td>110G</td> <td>6.70</td> <td>107.60</td> </tr> <tr> <td>2024</td> <td>39</td> <td>37.20</td> <td>11.60</td> </tr> </tbody> </table> <p>For Seri Pelangi Estate as per Seri Pelangi Replanting Programme 2018-2026 as per sample as following:</p> <table border="1" data-bbox="1010 1082 1581 1377"> <thead> <tr> <th>Year</th> <th>Field #</th> <th>Hectares</th> <th>Total Ha</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>4</td> <td>54.00</td> <td>321.00</td> </tr> <tr> <td>2019</td> <td>16</td> <td>58.00</td> <td>212.00</td> </tr> <tr> <td>2020</td> <td>12</td> <td>40.00</td> <td>320.00</td> </tr> <tr> <td>2025</td> <td>5</td> <td>47.00</td> <td>269.00</td> </tr> <tr> <td>2026</td> <td>19</td> <td>54.00</td> <td>215.00</td> </tr> </tbody> </table> | Year | Field # | Hectares | Total Ha | 2020 | 32B | 10.90 | 592.32 | 2021 | 145AE | 48.40 | 318.94 | 2022 | 90A | 4.20 | 93.80 | 2023 | 110G | 6.70 | 107.60 | 2024 | 39 | 37.20 | 11.60 | Year | Field # | Hectares | Total Ha | 2018 | 4 | 54.00 | 321.00 | 2019 | 16 | 58.00 | 212.00 | 2020 | 12 | 40.00 | 320.00 | 2025 | 5 | 47.00 | 269.00 | 2026 | 19 | 54.00 | 215.00 | Complied |
| Year | Field # | Hectares | Total Ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020 | 32B | 10.90 | 592.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021 | 145AE | 48.40 | 318.94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022 | 90A | 4.20 | 93.80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2023 | 110G | 6.70 | 107.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2024 | 39 | 37.20 | 11.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Year | Field # | Hectares | Total Ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018 | 4 | 54.00 | 321.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019 | 16 | 58.00 | 212.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020 | 12 | 40.00 | 320.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2025 | 5 | 47.00 | 269.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2026 | 19 | 54.00 | 215.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| 3.1.3 | <p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p> | <p>The management reviews conducted annually as per records of minutes of meeting for Sustainability & Supply Chain Management Review 2019 conducted latest on 15/07/2020.</p> | Complied |
| <p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p> | | | |
| 3.2.1 | <p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p> | <p>Jendarata POM: The Mill has established continual improvement plan documented and monitored. Data monitoring on yearly basis. Sighted the sampled implementation of the improvement plan FY 2020 as follows: a) Monitoring on Domestic Water Usage (Gallons per Capita) Employees Quarters. b) Monitoring on Water Usage in Mill (expressed in M3/Mt FFB) Processed. c) BOD (from final discharge of effluent ponds) express in ppm. d) Boiler Chimney Dust Emissions (g/Nm3) Jendarata Estate & Seri Pelangi Estate: Continuous Improvement Plan for year 2020 implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. Upgrading housing for workers, disinfect the trailer and office as prevention of Covid-19, kit allowance for all new workers on day of reporting to work, zero burn replanting, Empty Fertiliser Bags Utilization, Triple Rinsed Plastic Containers Dispatched to Certified Waste Managers, Reduction of Chemical Usage, Integrated Pest Management e.g. Barn Owl for Rat Control and Pheremone Trap for Oryctes sp. Control.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| 3.2.2 | <p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p> | <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Annual Communication of Progress is available publicly.</p> | Complied |
| Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored. | | | |
| 3.3.1 | <p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p> | <p>The standard SOP was established for all UP Estates and Mills. SOP latest revised on 01/08/2020 for mills. SOP covered all aspects of Mill Operation e.g. Boiler Cleaning, Biogas Plant Operation, Hot Work, Operation of Thresher Station, Digester Station, Kernel Plant Operation and Steriliser Station. As for estates, the estate operation SOPs has been established and in place accordingly. Sampled estate SOPs include Replanting, Weeding, Pruning, Circle Sanitation, Empty Fruit Branch Mulching, Manuring and Harvesting. The estate SOPs been approved by Ho Dua Tiam, Sr. Executive Director, dated 10/12/2007. The SOP copies were available in the Mill office and estates.</p> | Complied |
| 3.3.2 | <p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p> | <p>Mechanism to check consistent implementation of procedures is through internal audit by HRESH team on 21/08/2020. Non-compliances recorded with regards to P&C indicators have been closed effectively. The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers.</p> <p><i>However, during the audit the implementation of the procedure was not consistent as follows:</i></p> | Non-compliance |

| | | | |
|--|---|--|----------|
| | | <p>a) Jendarata POM: <i>Secondary containment was not provided for sampled liquid chemicals (Hexane, Potassium Iodate & Sulfuric Acid 0.02N) at Laboratory.</i></p> <p>b) Seri Pelangi Estate: <i>Secondary containment was not provided for the liquid pesticide chemicals stored at the Chemical Store.</i></p> <p><i>The above details were not consistent with requirement as per SOP [Chapter IV Safe Operating Procedure, Section 5: Transportation, Receiving, Handling, Storage and Disposal of Chemicals – clause 6]. Thus, a Minor NC been raised.</i></p> <p>Thus, a minor non-conformity was raised.</p> | |
| 3.3.3 | <p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p> | <p>Records of monitoring with regards to EHS and RSPO implementation are maintained and available for verification. Sample of records as follows: Jendarata POM: HRESH Internal Audit Report dated 21/08/2020. Seri Pelangi Estate: HRESH Internal Audit Report dated 25/08/2020.</p> | Complied |
| <p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> | | | |
| 3.4.1 | <p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p> | <p>No new planting within both Jendarata Estate and Seri Pelangi Estate except for existing planting only. EIA for existing plantings sighted available as per Environment Impact Assessment (EIA) document latest updated on 10/08/2020. The report shown all relevant operational environmental Evaluation, Ranking and Review Criteria; Impact/Risk Assessment; Action plan and Review plan.</p> <p>Social Impacts Assessment (SIA) was last reviewed on 10/08/2020 during the stakeholder meeting with the participation of internal and external stakeholders. The topics that reviewed are:</p> <ul style="list-style-type: none"> • Access and use rights • Economic livelihoods and working conditions | Complied |

**RSPO P&C Public Summary Report
Revision 10 (Mar 2020)**

| | | <ul style="list-style-type: none"> • Subsistence activities/ amenities • Human Rights • Cultural and religious values • Medical & health facilities • Education facilities • Operational activities <p>The assessment is conducted based on the Risk Matrix – Evaluation Criteria Chart and action plan was developed. For eg:</p> <table border="1"> <thead> <tr> <th>Social Impacts</th> <th>Impacts</th> <th>Severity (S)</th> <th>Quantity/ Frequency (Q)</th> <th>Probability (P)</th> <th>Over all</th> <th>Significance</th> </tr> </thead> <tbody> <tr> <td colspan="7">Jendarata Engineering Department</td> </tr> <tr> <td>High turnover of guest worker</td> <td>Negative</td> <td>4</td> <td>3</td> <td>3</td> <td>36</td> <td>Medium</td> </tr> <tr> <td>Recreation</td> <td>Positive</td> <td>2</td> <td>2</td> <td>2</td> <td>8</td> <td>Negligible (Good)</td> </tr> <tr> <td>Job opportunities</td> <td>Positive</td> <td>4</td> <td>4</td> <td>1</td> <td>16</td> <td>Low</td> </tr> <tr> <td colspan="7">Jendarata Estate</td> </tr> <tr> <td>High Recruitment Cost</td> <td>Negative</td> <td>2</td> <td>4</td> <td>3</td> <td>24</td> <td>Low</td> </tr> <tr> <td>Culture shock</td> <td>Negative</td> <td>4</td> <td>2</td> <td>3</td> <td>24</td> <td>Low</td> </tr> <tr> <td>Old folk home facilities</td> <td>Positive</td> <td>2</td> <td>2</td> <td>2</td> <td>8</td> <td>Negligible</td> </tr> </tbody> </table> | Social Impacts | Impacts | Severity (S) | Quantity/ Frequency (Q) | Probability (P) | Over all | Significance | Jendarata Engineering Department | | | | | | | High turnover of guest worker | Negative | 4 | 3 | 3 | 36 | Medium | Recreation | Positive | 2 | 2 | 2 | 8 | Negligible (Good) | Job opportunities | Positive | 4 | 4 | 1 | 16 | Low | Jendarata Estate | | | | | | | High Recruitment Cost | Negative | 2 | 4 | 3 | 24 | Low | Culture shock | Negative | 4 | 2 | 3 | 24 | Low | Old folk home facilities | Positive | 2 | 2 | 2 | 8 | Negligible | |
|---|----------|--|-------------------------|-----------------|--------------|-------------------------|-----------------|----------|--------------|---|--|--|--|--|--|--|-------------------------------|----------|---|---|---|----|--------|------------|----------|---|---|---|---|-------------------|-------------------|----------|---|---|---|----|-----|-------------------------|--|--|--|--|--|--|-----------------------|----------|---|---|---|----|-----|---------------|----------|---|---|---|----|-----|--------------------------|----------|---|---|---|---|------------|--|
| Social Impacts | Impacts | Severity (S) | Quantity/ Frequency (Q) | Probability (P) | Over all | Significance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jendarata Engineering Department | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High turnover of guest worker | Negative | 4 | 3 | 3 | 36 | Medium | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Recreation | Positive | 2 | 2 | 2 | 8 | Negligible (Good) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Job opportunities | Positive | 4 | 4 | 1 | 16 | Low | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jendarata Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High Recruitment Cost | Negative | 2 | 4 | 3 | 24 | Low | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Culture shock | Negative | 4 | 2 | 3 | 24 | Low | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Old folk home facilities | Positive | 2 | 2 | 2 | 8 | Negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <table border="1"> <tr> <td colspan="7">Seri Pelangi Estate</td> </tr> <tr> <td>Conflicts with stakeholder over boundary</td> <td>Negative</td> <td>4</td> <td>4</td> <td>1</td> <td>16</td> <td>Low</td> </tr> <tr> <td>Smallholders/ outsiders passing through estate</td> <td>Negative</td> <td>2</td> <td>4</td> <td>3</td> <td>24</td> <td>Low</td> </tr> <tr> <td>Staff locker of permit and passport</td> <td>Negative</td> <td>4</td> <td>4</td> <td>4</td> <td>64</td> <td>Critical</td> </tr> </table> | Seri Pelangi Estate | | | | | | | Conflicts with stakeholder over boundary | Negative | 4 | 4 | 1 | 16 | Low | Smallholders/ outsiders passing through estate | Negative | 2 | 4 | 3 | 24 | Low | Staff locker of permit and passport | Negative | 4 | 4 | 4 | 64 | Critical | |
|--|---|--|----------------------------|-------------|--------------------------------|---|-------------|--|----------|--|----------|---|---|---|----|-----|--|----------|---|---|---|----|-----|-------------------------------------|----------|---|---|---|----|----------|--|
| Seri Pelangi Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Conflicts with stakeholder over boundary | Negative | 4 | 4 | 1 | 16 | Low | | | | | | | | | | | | | | | | | | | | | | | | | |
| Smallholders/ outsiders passing through estate | Negative | 2 | 4 | 3 | 24 | Low | | | | | | | | | | | | | | | | | | | | | | | | | |
| Staff locker of permit and passport | Negative | 4 | 4 | 4 | 64 | Critical | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.4.2 | <p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p> | <p>Management plan/ action plan was developed together with the SIA report and last reviewed on 10/08/2020. The review was conducted during the stakeholder meeting with affected stakeholders.</p> <table border="1"> <tr> <th>Impacts</th> <th>Action plan</th> </tr> <tr> <td>High turnover of guest workers</td> <td>Management representative to conduct interview at source country to ensure guest workers are fully aware of working environment</td> </tr> <tr> <td>Work Safety</td> <td>All PPEs are provided at free of charge for checkroll and contractor's workers</td> </tr> </table> | Impacts | Action plan | High turnover of guest workers | Management representative to conduct interview at source country to ensure guest workers are fully aware of working environment | Work Safety | All PPEs are provided at free of charge for checkroll and contractor's workers | Complied | | | | | | | | | | | | | | | | | | | | | | |
| Impacts | Action plan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High turnover of guest workers | Management representative to conduct interview at source country to ensure guest workers are fully aware of working environment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Work Safety | All PPEs are provided at free of charge for checkroll and contractor's workers | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>Action plan for identified environmental impacts from the assessment was developed with participation of affected stakeholders adequately. Sighted sample action plan for some identified impacts as following:</p> <table border="1"> <thead> <tr> <th>Impacts</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>Soil erosion and siltation of waterways</td> <td>Quick establishment of low cover crops (LCC)</td> </tr> <tr> <td>Used lubricants generation</td> <td>Handling of scheduled waste</td> </tr> </tbody> </table> | Impacts | Action plan | Soil erosion and siltation of waterways | Quick establishment of low cover crops (LCC) | Used lubricants generation | Handling of scheduled waste | |
|---|---|---|----------|-------------|---|--|----------------------------|-----------------------------|--|
| Impacts | Action plan | | | | | | | | |
| Soil erosion and siltation of waterways | Quick establishment of low cover crops (LCC) | | | | | | | | |
| Used lubricants generation | Handling of scheduled waste | | | | | | | | |
| 3.4.3 | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p> | <p>The management plan is yearly reviewed by the management and the last reviewed was conducted on 10/08/2020 with the participation of affected stakeholders.</p> | Complied | | | | | | |
| <p>Criterion 3.5: A system for managing human resources is in place.</p> | | | | | | | | | |
| 3.5.1 | <p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -</p> | <p>United Plantations Berhad has developed employment procedures as below:</p> <ol style="list-style-type: none"> 1. Standard Operating Procedures – Recruitment of Local Workers (Rev. No.: 01 dated 31/03/2020) 2. Standard Operating Procedures – Recruitment of Executives and Non-Executives Staff (Rev. No.: 01 dated 31/03/2020) 3. Standard Operating Procedures – Recruitment of Guest Workers (Rev. No.: 03 dated 31/03/2020) <p>As per the procedures, the selection will be based on age, qualification and agricultural experience. Promotion is sole discretion of the respective management based on the performance of the job and leadership attributes. Besides, the management has clearly stated the process of selection of agent in the source of countries.</p> | Complied | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| 3.5.2 | <p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p> | <p>Interviewed with the HRESH Managers confirmed that the employment procedures are implemented. They will advertise the job vacancy in Jobs Malaysia for skilled workers, Jobstreet for executives, company’s website, newspaper and banner published in the entrance of the operating unit. Besides, they also practice “word of mouth” from employees. Seen the advertisement records and the recruitment records.</p> | Complied |
| <p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p> | | | |
| 3.6.1 | <p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantation Berhad has identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. For Jendarata mill sampled the HIRARC activity for Boiler Cleaning, Hot Work, Operation of Thresher Station, Digester Station, Ramp & Weighbridge and Steriliser Station. At the estate, among the HIRARC carried out covered sampled activities like Circle Sanitation, Manual Harvesting Oil Palm, Manuring – Fertilizer application (Manual & Mechanical), Pruning, Railway Track, Replanting Works – Deboling, Workshop Selective Weeding and Landfill operation. HIRARC is reviewed at least every 3 years (as per DOSH HIRARC Guidelines 2008), or whenever there is a change in activity/process or incidents. Latest overall HIRARC was reviewed and approved by the Mill Resident Engineer on 01/08/2020. As for the estates, at Jendarata Estate the latest HIRARC review was done on 13/05/2020 for the minor injury incident (medical leave – 1 day) dated 13/05/2020. At the Seri Pelangi Estate latest HIRARC review was done on 08/08/2020 for Connecting Tractor with Trailer and Disconnecting Tractor with Trailer.</p> | Complied |
| 3.6.2 | <p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantation Berhad has maintained an approved Health and Safety Policy dated 18/08/2017 that is displayed prominently on notice boards in English/Bahasa Malaysia. Safety & Health Management Plan was available accordingly for year 2020.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <p>Jendarata POM:</p> <p>CHRA was conducted on 31/10/2018 by DOSH registered assessor Reg. No. HQ/15/ASS/00/3. Recommendation action plan has been executed accordingly.</p> <p>Chemical Exposure Monitoring conducted on 20/06/2020 by DOSH registered assessor Reg. No. HQ/19/JH1/00/0032. Recommendation action plan has been executed accordingly.</p> <p>Local Exhaust Ventilation (LEV) conducted on 20/06/2020 by DOSH registered assessor Reg. No. HQ/16/JH11/00/214. Result of inspection concluded complied with ACGIH & USECHH Regulation 2000 requirements and the air borne contaminants were effectively removed from the work area/production into the outside atmosphere.</p> <p>Health Surveillance Program:</p> <p>Jendarata POM Annual Medical Surveillance has been conducted accordingly on 28/02/2020 for all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 19 workers by DOSH Reg. OHD No. HQ/12/DOC/00/279. Results indicates all 19 workers were fit to work.</p> <p>Jendarata Estate:</p> <p>CHRA was conducted on 20/10/2019 by DOSH registered assessor Reg. No. HQ/14/ASS/00/345. Recommendation action plan has been executed accordingly.</p> <p>Health Surveillance Program:</p> <p>Jendarata Estate Annual Medical Surveillance has been conducted accordingly on 14/02/2020, 21/02/2020 & 28/02/2020 for all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 84 workers by DOSH Reg. OHD No. HQ/12/DOC/00/279. Results indicates all 84 workers were fit to work. No pregnant/nursing workers were involved in pesticide handling works.</p> | |
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| | | <p>Noise Risk Assessment: Noise Risk Assessment conducted on 14/07/2020 by DOSH Registered competent person with Registration No. HQ/17/PEB/00/00011. Based on the report, workers i.e. Mechanical Harvester, Crawler Driver, Fitter & Maxiboom Driver been identified exposed to noise above Noise Exposure Limit. As per the report recommendation, Jendarata Estate is planning to send these workers for follow up test in October 2020. Further verification will be made during next audit visit.</p> <p>Seri Pelangi Estate: CHRA was conducted on 16/07/2019 by DOSH registered assessor Reg. No. HQ/14/ASS/00/346. Recommendation action plan has been executed accordingly.</p> <p>Health Surveillance Program: Seri Pelangi Estate Annual Medical Surveillance has been conducted accordingly on 13/05/2020 or all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 25 workers by DOSH Reg. OHD No. HQ/12/DOC/00/279. Results indicates all 25 workers were fit to work. No pregnant/nursing workers were involved in pesticide handling works.</p> <p>Noise Risk Assessment: Noise Risk Assessment conducted on 20/07/2020 by DOSH Registered competent person with Registration No. HQ/17/PEB/00/74. Based on the report, workers i.e. Field 16 (P2) and Workshop (P3) been identified exposed to noise above Noise Exposure Limit. As per the report recommendation, Seri Pelangi Estate is planning to send these workers for follow up test in October 2020. Further verification will be made during next audit visit.</p> | |
| <p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p> | | | |

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| <p>3.7.1</p> | <p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -</p> | <p>Jendarata POM, Jendarata Estate & Seri Pelangi Estate has established an annual training program with latest training program for year 2020 that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites. Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained e.g. in understanding of RSPO, Safety Data Sheet, safe working practices and the correct use of PPE.</p> | <p>Complied</p> |
| <p>3.7.2</p> | <p>Records of training are maintained. - Minor Compliance -</p> | <p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement as follows: Jendarata POM: a) HIRARC Training dated 19/09/2020 b) Schedule Waste Training dated 19/09/2020 c) Fire Fighting Drill Training dated 17/09/2020 d) Chemical & Lubricant Oil Spillage Training dated 08/09/2020 e) First Aider Training dated 20/08/2020 f) PPE Training dated 12/06/2020 Jendarata Estate: a) Harvesting – Mechanical Training dated 11/01/2020 b) Harvesting – Manual Training dated 07/07/2020 c) Spraying – Manual Training dated 24/06/2020 d) Lokomotif Policy Training dated 04/03/2020 e) Chemical Premixing Training dated 02/07/2020 f) PPE Training dated 02/12/2019 g) First Aid Training dated 27/02/2020</p> | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <p>h) Spill Kit Training dated 18/01/2020 j) Fire Drill & ERP Team on Fire Fighting Training dated 12/08/2020.</p> <p>Seri Pelangi Estate: a) Inter Pump Maintenance Training dated 11/09/2020 b) PPE Training dated 11/09/2020 c) Chemical Spillage Training dated 11/09/2020 d) Chemical Mixing Training dated 11/09/2020 e) First Aid Training dated 03/09/2020 f) Fire Drill Training dated 24/08/2020 g) Whistle blower policy/Corporate Social Responsibility Training dated 20/08/2020 h) HIRARC Manuring Technique dated 14/07/2020</p> | |
| 3.7.3 | <p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p> | <p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Weigh Bridge Supervisor, Weigh Bridge Operator, Process Supervisor, Lab Conductor, Lab Operator and Process Supervisor. The latest SCCS training was conducted on 17/01/2020.</p> | Complied |
| <p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p> | | | |
| 3.8.1 | <p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> | <p>Jendarata Palm Oil Mill received certified FFB from own supplying estates (Jendarata Estate and Seri Pelangi Estate). They are qualified for the Identity Preserved module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p> | | |
| 3.8.2 | <p>Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> | <p>The mill is declared to be Identity Preserved because the FFB processed is sourced from estates that are certified against the RSPO P&C.</p> | <p>Not Applicable</p> |
| 3.8.3 | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p> | <p>Complied</p> |
| 3.8.4 | <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p> | <p>The registration of PalmTrace will be carried out by the Shipping Department, Unitata Refinery. All transaction will be registered in the PalmTrace. The mill registered license available in PalmTrace as following: - Member ID: RSPO_PO1000000238 - Member category: Oil Mill - RSPO Membership No.: 1-0004-04-000-00</p> | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | - License Status: Expires on 28/12/2020 | |
| 3.8.5 | <p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. | <p>Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved is developed with Rev. No.: 08 dated 12/12/2019.</p> <p>The procedure has covered the following topics:</p> <ul style="list-style-type: none"> 1.0 Supply Chain Model 2.0 Definition of SCCS 3.0 General Chain of Custody requirements 4.0 Objectives 5.0 Sustainability Policy 6.0 Management Representative 7.0 Traceability – Purchasing and goods in 8.0 Traceability – Sales and goods out 9.0 MSPO Claim and IT Platform 10.0 Registration of transactions 11.0 Declassification/ downgrading of Certified Sustainable CPO/ PK (IP) 12.0 Processing 13.0 Procedures for handling of non-conforming palm oil products and/ or documents 14.0 Grievances// Complaints 15.0 Internal Audit 16.0 Record Keeping 17.0 Competency and training 18.0 Management review <p>The Director of Engineering, Downstream, Jendarata Engineering Department has the overall responsibility for the implementation and monitoring of MSPO</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <p>P&Cs, MSPO SCCS, RSPO P&Cs and RSPO SCCS at Jendarata Engineering Department. The appointment letter dated 13/02/2019 was sighted.</p> <p>Training on Supply Chain SOP was conducted on 17/01/2020 to the Supervisor of weighbridge, Weighbridge operator, lab personnel and process operators. Seen the training attendance and evaluation records. Interviewed with the weighbridge Supervisor confirmed that he is able demonstrate the SCCS SOP and requirements.</p> | |
| 3.8.6 | <p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p> | <p>Internal audit conducted based on the Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved. The frequency of the internal audit was at least annually as stated in the SOP. The procedure conforms to the requirements in the RSPO SCCS and Standard and the RSPO Market Communications and Claims.</p> <p>The latest Internal Audit for MSPO & RSPO was done on 11/06/2020 and a follow up audit on 21/08/2020 conducted by HRESH Department. There was no NC raised for RSPO SCCS during the audit. Seen the MSPO & RSPO Internal Audit Report dated 20/06/2020 and 24/08/2020.</p> <p>Management review meeting was conducted on 15/07/2020 which chaired by Resident Engineer. The outcome of the internal audit was discussed during the management review meeting.</p> | Complied |
| 3.8.7 | <p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> | <p>The mill is only received FFB from own certified supplying estates, Jendarata Estate and Seri Pelangi Estate as mentioned in the Appendix A, revised date 12/12/2019 of the Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved. All the tonnage of incoming of FFB will be recorded in the Daily FFB Reconciliation Record and Records of FFB Received (Division) by Weighbridge Operator on daily basis. Jendarata Palm Oil Mill has informed BSI for the extension volume and license period on June</p> | Complied |

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| | <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p> | <p>2020. The extended volume of FFB is 70,000 MT, CSPK is 3,850 MT and CSPO is 15,890 MT until 28/12/2020.</p> <p>Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved is developed to explain the mechanism for handling of non-conforming palm oil products and/ or documents.</p> | |
| <p>3.8.8</p> | <p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. | <p>Jendarata POM and Shipping Department has ensured the required information is available in document form. Sampled of contracts as below:</p> <p>CSPO</p> <p>Contract No.: UCPOP 20180021 – 1,925 MT</p> <ul style="list-style-type: none"> The name and address of the buyer: Unitata Berhad, Jendarata Estate, 36009 Teluk Intan The name and address of the seller: United Plantations Berhad, Jendarata Estate, Teluk Intan PK 36009 The loading or shipment/ delivery date: 04/12/2019 The date on which the documents were issued: 04/12/2019 RSPO certificate number: RSPO 693200 A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CPO (S/IP) The quantity of the products delivered: 251.47 MT Any related transport documentation: Invoice# 03190877 A unique identification number: Contract No.: UCPOP 20180021 <p>Contract No.: CPO (S/SG) 32/2020 – 1,000 MT</p> <ul style="list-style-type: none"> The name and address of the buyer: Intercontinental Specialty Fats Sdn Bhd, Lot 4, Solok Hishamudin 9/20, Kawasan Selat Klang Utara, 42009 Port Klang The name and address of the seller: United Plantations Berhad, Jendarata Estate, Teluk Intan PK 36009 The loading or shipment/ delivery date: 09/04/2020 | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <ul style="list-style-type: none"> • The date on which the documents were issued: 09/04/2020 • RSPO certificate number: RSPO 693200 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CPO (S/SG) • The quantity of the products delivered: 46.83 MT • Any related transport documentation: Delivery Order# 50164 • A unique identification number: Contract No.: S CPO (S/SG) 32/2020 <p><u>CSPK</u></p> <p>Contract No.: UPKP201900083 – 2,174 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: Unitata Berhad, Jendarata Estate, 36009 Teluk Intan • The name and address of the seller: United Plantations Berhad, Jendarata Estate, Teluk Intan PK 36009 • The loading or shipment/ delivery date: 02/01/2020 • The date on which the documents were issued: 02/01/2020 • RSPO certificate number: RSPO 693200 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): PK (S/SG) • The quantity of the products delivered: 45.91 MT • Any related transport documentation: Delivery Order# 54927 • A unique identification number: Contract No.: UPKP201900083 <p>Contract No.: UPKP202000010 – 2,174 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: Unitata Berhad, Jendarata Estate, 36009 Teluk Intan • The name and address of the seller: United Plantations Berhad, Jendarata Estate, Teluk Intan PK 36009 • The loading or shipment/ delivery date: 07/07/2020 • The date on which the documents were issued: 07/07/2020 | |
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| | | <ul style="list-style-type: none"> • RSPO certificate number: RSPO 693200 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): PK (S/SG) • The quantity of the products delivered: 24.18 MT • Any related transport documentation: Delivery Order# 58021 • A unique identification number: Contract No.: UPKP202000010 | |
| 3.8.9 | <p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> | <p>There is no any outsourcing activity related to processing and storage except for transport delivery only. However, the transportation is only transporting the conventional CPO. Certified CPO is transporting via pipeline to the refinery from the mill. Therefore, the mill does not engage any outsourced party for certified products.</p> | <p>Not Applicable</p> |

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| | d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. | | |
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | There is no outsourced activity in Jendarata POM. Thus, this is not applicable. | Not Applicable |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. | There was no contractor used for the physical handling of RSPO certified products by the mill. | Complied |
| 3.8.12 | <p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> | <p>The retention period for traceability records are minimum 3 years as per the Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved.</p> <p>Verified the records such as internal audit report, mass balance sheets, training records and management review meeting minutes are accurate, complete, up-to-date and accessible.</p> <p>The Sustainability team will record and balance all the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis in the Mass Balance Sheet. Verified the Mass Balance Sheet from June 2019 to August 2020 confirmed that no oversold of products. The closing stock for August 2020 is 235.09 MT.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p> | | |
| 3.8.13 | <p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | Conversion factor of CPO and PK production is depending on the actual OER and KER. | Complied |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | The facility is using the actual extraction rate and therefore updating of rates is not necessary. | Complied |
| 3.8.15 | <p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | Standard Operating Procedure for RSPO Supply Chain Module D – CPO Mills: Identity Preserved has explained the processing of RSPO material to prohibit non-certified products processed. The mill is 100% received certified FFB from own certified supplying estates and produced 100% certified products. There are no non-certified materials will be received and processed as verified through the Daily FFB Reconciliation Record and Records of FFB Received (Division). | Complied |
| 3.8.16 | Registration of Transactions | Sampled the shipping announcement as below: | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p> | <p>a) Transaction ID: TR-0d814a43-eac8, last delivery on 09/12/2019, created on 17/12/2019 and confirmed on 20/12/2019 for 622.58 MT of CSPO</p> <p>b) Transaction ID: TR-e716a51e-8539, last delivery on 20/04/2020, created on 30/04/2020 for 46.83 MT of CSPO</p> <p>c) Transaction ID: TR-4a3fa95e-f37d, last delivery on 22/01/2020, created on 23/01/2020 for 361.63 MT of CSPK</p> <p>d) Transaction ID: TR-c7d5d668-83af, last delivery on 12/07/2020, created on 16/07/2020 for 450.92 MT of CSPK</p> <p>All the announcements were made as per the procedure within 1 month from the date of last delivery.</p> | |
| 3.8.17 | <p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p> | <p>United Plantations Berhad has obtained RSPO Trademark License with License Number: 1-0004-04-100-00 valid until 04/07/2022 for supply chain model, IP. List of Supply Chain certificates that allowed to use the trademark logo are Jendarata POM, UIE POM, Ulu Bernam Optimill POM and Ulu Basir POM. Jendarata POM only use the RSPO Trademark logo for general corporate communication.</p> | Complied |
| General corporate communications | | | |
| 4.1 | <p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p> | <p>United Plantations Berhad has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: http://www.unitedplantations.com/.</p> <p>Besides, RSPO Trademark logo was used on the filing system of sustainability documentation and 7 CPO and 3 PK storage tanks to promote RSPO.</p> | Complied |
| 4.2 | <p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO | <p>United Plantations Berhad has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: http://www.unitedplantations.com/.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p> | | |
| 4.3 | <p>In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p> | <p>United Plantations Berhad does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p> | Complied |
| 4.4 | <p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.</p> | <p>United Plantations Berhad ensure communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.</p> | Complied |
| 4.5 | <p>Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.</p> | <p>No RSPO corporate logo used as evidence during the document audit and site visit.</p> | Complied |
| Business to business communications | | | |
| 5.1 | <p>Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.</p> | <p>Business to business communication is demonstrated via shipping documentation and sales contract to the next supply chain actor or buyer.</p> | Complied |
| 5.2 | <p>When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.</p> | <p>The requirements of the RSPO SCCS are adhered to and was verified from the sampled weighbridge tickets of the sales of CPO. The sampled documents are as below:</p> | Complied |

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| | | <ol style="list-style-type: none"> 1. Customer: Intercontinental Specialty Fats Sdn Bhd Transporter: Sakthy Transport Sdn Bhd Product: CPO Ticket Number: 56871 Nett Weight: 46.67 MT RSPO Cert Number: RSPO 693200 (SG) 2. Customer: Unitata Fleet Palms Transporter: Customer's transport Product: PK Ticket Number: 54927 Nett Weight: 45.91 MT RSPO Cert Number: RSPO 693200 (SG) | |
| 5.3 | <p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <ol style="list-style-type: none"> a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. | Not applicable as Jendarata POM is neither distributors nor wholesalers. | Not Applicable |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. | | |
| Business to consumer communication | | | |
| 6.1 | Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary. | Not applicable to Jendarata POM as they do not conduct business to consumer claims. | Not Applicable |
| 6.2 | Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below. | Not applicable to Jendarata POM as they do not conduct business to consumer claims. | Not Applicable |
| 6.3 | When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present. | Not applicable to Jendarata POM as they do not conduct business to consumer claims. | Not Applicable |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | Not applicable to Jendarata POM as they do not conduct business to consumer claims. | Not Applicable |
| 6.5 | Members shall not communicate to consumers' information about their suppliers' RSPO membership status. | Not applicable to Jendarata POM as they do not conduct business to consumer claims. | Not Applicable |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | There was no use of RSPO Trademark logo used on product claim. | Complied |

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| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim. | There was no use of RSPO Trademark logo used on product claim. | Complied |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org . | Not applicable as Jendarata POM do not fall under the category of retailers or food service companies. | Not Applicable |
| MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES | | | |
| Certified oil palm content (IP) | | | |
| | For IP, 95% or above of the oil palm content must be RSPO IP-certified. | Oil palm content is 100% IP certified CPO and claim as RSPO IP-certified. | Complied |

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| | For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP. | There was SG claim made which downgraded from RSPO IP-certified products to SG as requested by clients. The oil palm content is 100% IP certified CPO. | Complied |
| | Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume. | Oil palm content is 100% certified IP CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified. | Complied |
| Labelling and trademark (IP) | | | |
| | Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. | There was no RSPO label used on product communication. | Complied |
| Messaging (IP) | | | |
| | Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org | There was no RSPO label and RSPO Trademark used on product communication. | Complied |

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| | <ul style="list-style-type: none"> • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | | |
| <p>Principle 4: Respect community and human rights and deliver benefits</p> | | | |
| <p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p> | | | |
| <p>4.1.1</p> | <p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has established Human Rights Policy dated 09/03/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting retaliation, intimidation and harassment against Human Rights Defenders (HRD), whistleblowers, complainants and community spokespersons. The policy has been distributed to the external stakeholders in Stakeholders' Booklet and briefed to all the workers in JED on 12/03/2020 by Residence Engineer, 28/02/2020 in Jendarata Estate and 13/08/2020 in Seri Pelangi Estate.</p> | <p>Complied</p> |
| <p>4.1.2</p> | <p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p> | <p>United Plantations Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management.</p> | <p>Complied</p> |

| Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties | | | |
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| 4.2.1 | <p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has established Human Rights Policy dated 09/03/2020 signed by Chief Executive Director where they committed to the protection and advancement of human rights including prohibiting retaliation, intimidation and harassment against Human Rights Defenders (HRD), whistleblowers, complainants and community spokespersons.</p> | Complied |
| 4.2.2 | <p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p> | <p>United Plantations Berhad has established Grievance Redressal Procedure Internal Stakeholder and External Stakeholder to clear up the misunderstandings/ conflicts/ grievances or raising any issues with United Plantations Berhad. The procedure is adopted in an effective, timely and appropriate manner that is open and transparent to any affected parties. The Company Secretary of United Plantations Berhad will be the person responsible to handle all the enquiries and grievances. The time frame to settle the grievances should be not more than 30 days from the date of receipt for external issue and 7 working days for internal issues. The procedure was developed in various languages such as Bahasa Malaysia, English and Tamil and has distributed to the workers and external stakeholders in Stakeholders' Booklet.</p> | Complied |
| 4.2.3 | <p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p> | <p>Jendarata Estate has implemented Workers' Quarters Repair & Maintenance Record and Registry Record of Requests to record and monitor any request and grievance reported by internal and external stakeholders. For eg: One of the workers in House No.: 16/85 reported that the door in the bathroom was broken on 12/06/2020. The management has carried out the repair work on 13/06/2020 and the complainant has acknowledged after the work done. Interviewed with the workers confirmed that the management has taken immediate action to attend to all the housing repair complaint.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | Seri Pelangi Estate has implemented Request/ Complaints Form to record any grievances. Sampled one of the complaints regards the clogged of the toilet bowl on 07/09/2020 at House No.: 9. The management has assigned the Hospital Assistant to arrange the workers for septic tank cleaning on 08/09/2020. The cleaning job was carried out by worker and seen the Record of Sewage Book for the job done. | |
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance - | Grievance Redressal Procedure for Internal and External Stakeholder has established to provide a mechanism for the complainant to access to independent legal and technical advice if the complaint is unresolved mutually. | Complied |
| Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance - | Jendarata Estate’s management has made contribution to the local communities such as granted the permission for the school for cross country event, provide water tank to the temple for festival celebration. Besides, all the estates and mill’s management has provided school bus subsidized to the children of the workers to school with minimum RM 30. The company has organized annual pap-smear test for all the female employees. | Complied |
| Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | |
| 4.4.1 | (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance - | Total Land 74 Titles for Jendarata Estate as per sample: - Title # 262355; Lot # 13457; District: Hilir Perak; Sub-district: Mukim Hutan Melintang; Area: 72.88 ha - Title # 262349; Lot # 13458; District: Hilir Perak; Sub-district: Mukim Hutan Melintang; Area: 533.2 ha - Title # 1905; Lot # 4733; District: Hilir Perak; Sub-district: Mukim Teluk Baru; Area: 0.5707 ha | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <ul style="list-style-type: none"> - Title # 257944; Lot # 7667; District: Hilir Perak; Sub-district: Mukim Durian Sebatang; Area: 36.06 ha - Hectarage statement 2020 – Oil palm: 5,285.60 ha; Coconut: 698.15 ha; Total planted area: 5,983.75 ha; <p>Total Land 5 Titles for Seri Pelangi Estate as per sample:</p> <ul style="list-style-type: none"> - Title # 361064; Lot # 7272; District: Hilir Perak; Sub-district: Mukim Changkat Jong; Area: 508.6 ha - Title # HSD 19298; Lot # PT 5820; District: Hilir Perak; Sub-district: Mukim Changkot Jong; Area: 507.04 ha - Title # 361065; Lot # 6099; District: Hilir Perak; Sub-district: Mukim Changkot Jong; Area: 403. 4 ha | |
| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders’ consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |
| 4.4.2a | Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance - | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders’ consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |

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| 4.4.2b | <p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p> | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |
| 4.4.2c | <p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p> | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |
| 4.4.3 | <p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p> | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |
| 4.4.4 | <p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p> | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC). | |
| 4.4.5 | <p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p> | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |
| 4.4.6 | <p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p> | <p>The reviewed records of land titles and maps confirmed that there is no occurrence of FPIC process since no presence of customary land at both estates within Jenderata certification area. This was also verified through stakeholders' consultation. Hence, no any FPIC agreement made as of the time of on-site audit.</p> <p>In case of any arising land dispute including encroachment into customary land (if applicable), the process will be based on SOP for Land Dispute Settlement as per Free Prior & Informed Consent (FPIC).</p> | Complied |
| <p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p> | | | |
| 4.5.1 | <p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |
| 4.5.2 | <p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new</p> | Complied |

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| | <p>for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p> | <p>planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | |
| 4.5.3 | <p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |
| 4.5.4 | <p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |
| 4.5.5 | <p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| 4.5.6 | <p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |
| 4.5.7 | <p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |
| 4.5.8 | <p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p> | <p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within Jendarata Estate and Seri Pelangi Estate. The estate lands are legally owned by United Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p> | Complied |
| <p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p> | | | |
| 4.6.1 | <p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has developed Standard Operating Procedures – Land Acquisition, Issue Date: 24/08/2020. The objective is to handle land acquisition process in accordance to the national legislation and RSPO FPIC protocols. Participatory mapping of the area to identify the extend of recognizing legal, customary or user rights with involvement of affected parties. Negotiation in a fair and transparent manner through open and consensual agreement with owner/ affected parties. Any compensation paid should be fair and in accordance with agreed amount.</p> | Complied |

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| | | Besides, Standard Operating Procedure for Land Dispute Settlement in accordance with the Free, Prior & Informed Consent (FPIC) Principle was developed and published in company's website to outline the process of land dispute. | |
| 4.6.2 | <p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p> | <p>SOP as per indicator 4.6.1.</p> <p>There was no dispute that involved compensation in Jendarata Business Units.</p> | Complied |
| 4.6.3 | <p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p> | There were no scheme smallholders attached with United Plantations Berhad, Jendarata Business Unit. | Complied |
| 4.6.4 | <p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p> | There was no dispute that involved compensation in Jendarata Business Units. | Complied |
| <p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p> | | | |
| 4.7.1 | <p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p> | United Plantations Berhad has developed Standard Operating Procedures – Land Acquisition, Issue Date: 24/08/2020. The objective is to handle land acquisition process in accordance to the national legislation and RSPO FPIC protocols. Participatory mapping of the area to identify the extend of recognizing legal, customary or user rights with involvement of affected parties. Negotiation in a fair and transparent manner through open and | Complied |

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| | | consensual agreement with owner/ affected parties. Any compensation paid should be fair and in accordance with agreed amount. | |
| 4.7.2 | <p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p> | SOP as per indicator 4.6.1. | Complied |
| 4.7.3 | <p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p> | There was no community that have lost access and rights to land for plantation since there was no expansion by the company during the time of audit. However, the company has provided job opportunity to the local communities as this has verified through the master list of employee. | Complied |
| <p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p> | | | |
| 4.8.1 | <p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p> | <p>There was a dispute case lodged on April 2016 where the claimant claimed that Seri Pelangi Estate management has encroached into his TOL rent land at field 7,18 and 21 for about 6 acres. Meetings between the management and the claimants were conducted and seen the records. Land survey was carried out by the claimant and the result shown that the land is belong to TOL and United Plantations Berhad has applied from TNB for the said land on 12/03/2020. Seri Pelangi Estate Manager has sent a letter on 12/05/2020 to the claimant on the status of the said land and the claimant agreed with the result of survey with the replied letter on 18/05/2020. Thus, the case is resolved.</p> <p>During the stakeholder consultation, there was one smallholder has reported to auditor that Seri Pelangi Estate has encroached into his land. He claimed that he has conducted a survey by non-accredited surveyor and confirmed that the company has encroached into his land. However, he could not show the survey map. The management has acknowledged the issue and had a meeting</p> | Complied |

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| | | with the claimant and Company Secretary to further investigate this issue. Letter of meetings were sighted. The company has agreed to conduct a land survey at the said land by accredited survey at company's cost. This will be verified during the next assessment. | |
| 4.8.2 | <p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p> | Refer to indicator 4.8.1. | Complied |
| 4.8.3 | <p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p> | There was no acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The last acquisition was from corporate plantation company on 19/08/2019. | Complied |
| 4.8.4 | <p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p> | Refer to indicator 4.8.1, map with disputed area was mapped out in a participatory way with the involvement of the claimant. The map was available. | Complied |
| <p>Principle 5: Support smallholder inclusion</p> | | | |
| <p>Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p> | | | |

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| 5.1.1 | Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance - | Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received and processed FFB only from own estates and FFB diversion from group certified units. The FFB supplier were listed in the mill FFB Supplier list. | Complied |
| 5.1.2 | (C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance - | The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. | Not Applicable |
| 5.1.3 | (C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance - | The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. | Not Applicable |
| 5.1.4 | (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance - | The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. | Not Applicable |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance - | Agreed payments are made in a timely manner, other type of contracts available as per sample sighted as following: Memorandum of Agreement between Seri Pelangi Estate and SV Thambi Enterprise; MOA # 13601; Date: 01/01/2020; Contract Specification for Transporter; Schedule 1; Account # 05/06/31819; Contract period: 1/1 – 31/12/2020 | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance - | Agreed payments are made in a timely manner as per sample sighted as following: MOA # 13601 Certificate of Payment CP # 17200070; Date: 31/08/2020; Payment date: 04/09/2020 | Complied |
| 5.1.7 | Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance - | The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, mandatory weighbridge calibration was still conducted as per sample sighted as following: Acknowledgement of Calibration for Weighing & Measurement (Perakuan Penentuan Timbang Dan Sukat); Slip # B 1512073; Weighbridge serial # 01424106HNJ; Date: 20/01/2020; Previous year calibration date: 18/01/2020 by Metrology Corporation Malaysia Sdn. Bhd. | Complied |
| 5.1.8 | The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance - | The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, periodical supports to smallholders still made through knowledge sharing programs such as Smallholder Field Day programs as per sample sighted been conducted on 16/11/2019 involving smallholders within Teluk Intan. Previous year conducted 17/11/2018. | Complied |
| 5.1.9 | (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance - | No any grievance received from stakeholders. The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSSCOMDEV (HMS)-024). | Complied |
| Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. | | | |
| 5.2.1 | The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to | The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, periodical supports to smallholders still made through knowledge sharing programs such as Smallholder Field Day programs as per | Complied |

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| | <p>assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p> | <p>sample sighted been conducted on 16/11/2019 involving smallholders within Teluk Intan. Previous year conducted 17/11/2018.</p> | |
| 5.2.2 | <p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p> | <p>The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, periodical supports to smallholders still made through knowledge sharing programs such as Smallholder Field Day programs as per sample sighted been conducted on 16/11/2019 involving smallholders within Teluk Intan. Previous year conducted 17/11/2018.</p> | Complied |
| 5.2.3 | <p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p> | <p>The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, periodical supports to smallholders still made through knowledge sharing programs such as Smallholder Field Day programs as per sample sighted been conducted on 16/11/2019 involving smallholders within Teluk Intan. Previous year conducted 17/11/2018.</p> | Complied |
| 5.2.4 | <p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p> | <p>The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, periodical supports to smallholders still made through knowledge sharing programs such as Smallholder Field Day programs as per sample sighted been conducted on 16/11/2019 involving smallholders within Teluk Intan. Previous year conducted 17/11/2018.</p> | Complied |
| 5.2.5 | <p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p> | <p>The mill received and processed FFB only from own estates and FFB diversion from group certified units. Hence, no FFB received from external suppliers or smallholders. However, periodical supports to smallholders still made through knowledge sharing programs such as Smallholder Field Day programs as per sample sighted been conducted on 16/11/2019 involving smallholders within Teluk Intan. Previous year conducted 17/11/2018.</p> | Complied |

| Principle 6: Respect workers' rights and conditions | | | |
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| Criterion 6.1: Any form of discrimination is prohibited. | | | |
| 6.1.1 | <p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has established Human Rights Policy dated 09/03/2020 signed by Chief Executive Director where they ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights and provide equal opportunities to all personnel regardless of religion, race, age, gender, nationality or physical disability.</p> | Complied |
| 6.1.2 | <p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p> | <p>The process of recruitment, promotion and remuneration are solely based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity for promotion based on capabilities. Female workers have been promoted as mandores well. There was no recruitment fee being paid by the workers during the time of audit.</p> | Complied |
| 6.1.3 | <p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p> | <p>The process of recruitment, promotion and remuneration are solely based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability as per the policy above. Interviewed with the workers confirmed that promotion is based on capabilities and performance. There were female workers who have been promoted to be mandores.</p> | Complied |
| 6.1.4 | <p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p> | <p>Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. They will informed to the Hospital Assistant if they are pregnant for job transfer.</p> | Complied |

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| 6.1.5 | <p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p> | <p>Gender Committee for Downriver Business Unit was established in the company as group committee. A Business Unit’s meeting was conducted on 18/8/2020. Seen the meeting minutes and found no sexual harassment case reported.</p> <p>Besides, each operating unit has established their own Gender Committee as well. The last meeting conducted on JED was on 18/09/2020, 23/06/2020 in Jendarata Estate and 27/08/2020 in Seri Pelangi Estate. Seen the meeting minutes and supporting records for the requests raised by the female workers. Besides, ongoing on-job training was provided to the female workers such as operator and lab personnel in order to improve their job capability.</p> <p>In additional, the management does not discriminate the female workers by promoted them to be mandora and head of workers in the operation. This has been verified through interviewed with the female workers and reviewed the master list.</p> | Complied |
| 6.1.6 | <p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p> | <p>Reviewed on the total 42 payslips (December 2019, January 2020, March 2020, April 2020 and August 2020) in Jendarata Business Unit which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Overtime and work on rest day were paid according to Employment Act 1955.</p> | Complied |
| <p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p> | | | |
| 6.2.1 | <p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p> | <p>All the workers have signed on the employment contract prior to work. The contract is in their national languages such as Bahasa Malaysia, English and Tamil/ Hindi. All the terms and conditions were clearly outlined in the contract and briefed to all the workers before they signed the contract during induction training. Sampled of the contracts as below:</p> <ul style="list-style-type: none"> • Employee No.: 30152 (JED) • Employee No.: 30506 (JED) | Complied |

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| | | <ul style="list-style-type: none"> • Employee No.: 30221 (JED) • Employee No.: 30432 (JED) • Employee No.: 30493 (JED) • Employee No.: 30373 (JED) • Employee No.: 215039 (JE) • Employee No.: 217783 (JE) • Employee No.: 220471 (JE) • Employee No.: 222022 (JE) • Employee No.: 219334 (JE) • Employee No.: 21361 (JE’s Contractor Worker) • Employee No.: 21671 (JE’s Contractor Worker) • Employee No.: 21367 (JE’s Contractor Worker) • Employee No.: 21369 (JE’s Contractor Worker) • Employee No.: 21370 (JE’s Contractor Worker) • Employee No.: 100481 (SPE) • Employee No.: 106791 (SPE) • Employee No.: 106935 (SPE) • Employee No.: 107824 (SPE) • Employee No.: 107972 (SPE) • Employee No.: 107879 (SPE) | |
| 6.2.2 | <p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on</p> | <p>Sampled total 42 employment contracts and payslips (December 2019, March 2020, April 2020 and August 2020). It has clearly stated that the payment and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, reasons for dismissal, period of notice) in the employment contract.</p> | Complied |

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| | <p>compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p> | | |
| 6.2.3 | <p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p> | <p>Verified the payslips confirmed that the workers were paid according to the Employment Act 1955 and Minimum Wage Order 2020. Deduction of wages was made as per approval from Labour Department.</p> | Complied |
| 6.2.4 | <p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p> | <p>The Hospital Assistant in Jendarata Estate has conducted linesite inspection at least twice a month as per the Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446). The inspection was carried out using the Weekly Inspection of Workers & Staff Quarters/ Shophouses & Office/ Mill Complex. Besides, VMO will joined the inspection twice a month with the HA. The inspection carried out for September was 10/09/2020 and 18/09/2020.</p> | Complied |
| 6.2.5 | <p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p> | <p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry shops are available inside the estates. During the MCO period, the management has ensured the sundry shops are supplying sufficient goods and foods by helping them to purchase the foods and goods to stock up first. Therefore, there was no issue for the workers to access to sufficient foods and goods during MCO period.</p> | Complied |
| 6.2.6 | <p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> | <p>United Plantations Berhad has collaborated with Monash University, Sime Darby Berhad and IOI Berhad to establish a study on Decent and Fair Wages in Malaysia. The prevailing wage calculation has included all the in-kind benefits provided to the workers such as housing and healthcare. Sampled the prevailing wages for benefit of Housing that provided to each worker, RM</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line</i></p> | <p>492.56 and Health for each worker, RM 342.12. The total prevailing wages is RM 2,186.31 in Jendarata Estate and RM 2,013.53 in Seri Pelangi Estate.</p> | |
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| | <p>with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country). Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p> | | |
| 6.2.7 | <p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p> | <p>All the core works are performed by permanent and full-time employees in Jendarata Business Unit. There were contractors' workers working for general work and harvesting in the estates permanently. There were no casual or temporary workers used in the company.</p> | Complied |
| <p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |
| 6.3.1 | <p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has established Human Rights Policy dated 09/03/2020 signed by Chief Executive Director where they respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively. The policy is developed in different languages such as Bahasa Malaysia, English and Tamil. The policy has been briefed to all the workers in JED on 12/03/2020 by Residence Engineer, 28/02/2020 in Jendarata Estate and 13/08/2020 in Seri Pelangi Estate.</p> | Complied |

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| 6.3.2 | <p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p> | <p>Guest Workers Committee was established in JED and meeting was conducted once every 2 months. The last meeting was held on 15/08/2020 and issues raised were recorded in the minutes. Besides, NUPW representative has been invited to stakeholder meeting conducted on 10/08/2020.</p> <p>Jendarata Estate has established Guest Workers Committee and meeting was conducted once every 2 months. The last meeting was conducted on 27/08/2020 and seen the meeting minutes. There were representatives from management, Indonesia, Bangladesh and India attended in the meeting. Issues raised during the meeting were rectified by the management. For eg: Worker has requested for dustbin at housing area on 30/05/2020. The management has purchased poly dustbins and distributed to the respective workers. Seen the invoice# IV-26260 dated 14/06/2020.</p> <p>Seri Pelangi Estate has conducted Guest Workers Committee meeting once every 2 months. Reviewed the meeting minutes found that no issue was reported. Interviewed with the workers confirmed that they are satisfied to work in the plantations.</p> | Complied |
| 6.3.3 | <p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p> | <p>Interviewed with the workers confirmed that the election of the representatives was elected freely by the workers without any interference of management. They are aware of their own representative.</p> | Complied |
| Criterion 6.4: Children are not employed or exploited. | | | |
| 6.4.1 | <p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p> | <p>United Plantations Berhad has established Human Rights Policy dated 09/03/2020 signed by Chief Executive Director where they will not tolerate the use of child or forced labour, slavery or human trafficking in any of the plantations and facilities. They are using the definition from United Nations Convention on the Rights of the Child which define "child" as anyone who is less than 18 years old.</p> | Complied |

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| 6.4.2 | <p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has 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>Verified the Master List of Jendarata Engineering Department, Jendarata Estate and Seri Pelangi Estate found that all the workers employed are above 18 years old.</p> | Complied |
| 6.4.3 | <p>(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p> | <p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Master List and through interviewed with the stakeholders.</p> | Complied |
| 6.4.4 | <p>The unit of certification demonstrates communication about its ‘no child labour’ policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p> | <p>The policy has been briefed to all the stakeholders during stakeholder meeting on 10/08/2020. Besides, briefing to the workers was conducted on the negative effects of child labour. Interviewed with the workers confirmed that no child labour is allowed to be in the operations.</p> | Complied |
| Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | |
| 6.5.1 | <p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has developed Gender Policy dated 24/04/2015 signed by Chief Executive Director. They are committed to maintain a workplace free from harassment on any kind, including harassment based on an employee’s race, colour, religion, gender national origin, ancestry, disability, marital status and sexual orientation. The policy has been briefed to all the workers in JED on 12/3/2020 by Residence Engineer, 28/02/2020 in Jendarata Estate and 17/08/2020 in Seri Pelangi Estate.</p> | Complied |

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| 6.5.2 | <p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has developed Gender Policy dated 24/04/2015 signed by Chief Executive Director. They protect the Reproductive Rights and Motherhood responsibilities of women as under the Universal Declaration of Human Rights and labour laws. The policy has been briefed to all the workers in JED on 12/03/2020 by Residence Engineer, 28/02/2020 in Jendarata Estate and 17/08/2020 in Seri Pelangi Estate.</p> | Complied |
| 6.5.3 | <p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p> | <p>Reviewed the maternity records and interviewed with the female workers confirmed that no pregnancy and breastfeeding women for the past 3 years. Therefore, there was no any consultation been carried out for new mother at this moment.</p> | Complied |
| 6.5.4 | <p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> | <p>Sexual Harassment Grievance Procedure was established and published in company website: http://www.unitedplantations.com/sustainability/our_objectives.asp. Any grievance related to sexual harassment or violence case is referred to the procedure where they can obtain complaint form from one of the sub-committee members in respective estates/ departments. If the issue is not resolved in 2 weeks from the date of complaint or the victim is not satisfied with the way of the issue dealt, Gender Committee should bring this issue to Group Manager HRESH.</p> | Complied |
| <p>Criterion 6.6: No forms of forced or trafficked labour are used.</p> | | | |
| 6.6.1 | <p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime | <p>Interviewed with the workers confirmed that no forced and trafficked labour in Jendarata Business Units. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They kept their passport in the lockers in front of the office and they are allowed to access to their passport anytime. The workers are entered to overtime voluntarily. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> | Complied |

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| | <ul style="list-style-type: none"> Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p> | | |
| 6.6.2 | <p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p> | <p>United Plantations Berhad has developed Guest Workers Policy dated 17/8/2020 by Chief Executive Director. The Guest Workers Policy has included the following objectives:</p> <ul style="list-style-type: none"> Contract substitution is strictly prohibited. They ensure living quarters for all workers are in compliance with the "Workers' Minimum Standards of Housing and Amenities Act 1990". All statutory payments with genuine receipts incurred in the recruitment process shall be reimbursed by the Company. Conduct post-arrival orientation program for new guest workers. Any forms of discrimination are prohibited. And etc. <p>Interviewed with the workers confirmed no contract substitution occurred during their recruitment. All the terms and conditions agreed earlier were the same. They were provided with good housing facilities and it is well maintained by the company. They informed that the management treated equally among of them. For eg: offer overtime to everyone whoever wish to work for overtime.</p> | Complied |
| <p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p> | | | |
| 6.7.1 | <p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> | <p>The responsible person(s) for H&S has been identified. Records of regular meetings between the responsible person(s) and workers were maintained accordingly. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. Sampled details as follows:</p> | Complied |

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| | <p>- Critical (Major) compliance -</p> | <p>Jendarata POM: OSH meeting conducted on quarterly basis. For year 2020/2019 sampled the meeting minutes dated 29/06/2020, 31/03/2020 & 30/12/2019. The OSH discussion agenda was adequately addressed. OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p> <p>Jendarata Estate: OSH meeting conducted on quarterly basis. For year 2020/2019 sampled the meeting minutes dated 20/09/2020, 13/06/2020, 06/03/2020 & 04/12/2019. The OSH discussion agenda was adequately addressed. OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p> <p>Seri Pelangi Estate: OSH meeting conducted on quarterly basis. For year 2020/2019 sampled the meeting minutes dated 18/09/2020, 15/06/2200, 16/03/2020 & 16/12/2019. The OSH discussion agenda was adequately addressed. OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also</p> | |
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RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <p>that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p> | |
| <p>6.7.2</p> | <p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p> | <p>Accident and emergency procedures have been communicated to employees, contractors and visitors.</p> <p>Fire Evacuation drill was conducted accordingly. The latest Fire evacuation drill at Jendarata POM was conducted on 17/09/2020. As for Jendrata Estate the latest fire drill was conducted on 12/08/2020, and at Seri Pelangi Estate the latest fire drill was conducted on 24/08/2020 to test the state of readiness during emergency situation.</p> <p>Accident and emergency procedures are in English/Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <p>Training for First Aid is conducted on annual basis. Adequate first aiders trained available. Latest First Aid Training done dated 20/08/2020 at Jendarata POM, 27/02/2020 at Jendarata Estate and 03/09/2020 at Seri Pelangi Estate.</p> <p>First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area.</p> <p>Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</p> <p>Portable emergency eye wash & shower facility available at chemical store, workshop and mixing area as applicable.</p> <p>Verified that there were no incidents occurred at Jendarata POM from January 2020 until as to date. At Jendarata Estate 2 accident occurred with medical leave 1.0 day. At Seri Pelangi Estate, 2 reportable accidents occurred with JKKP 6 submission (MC>4days).</p> <p>Verified that the Accident investigation has been carried out accordingly along with HIRARC review.</p> | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | | <p>DOSH visit been recorded in the DOSH log book. Seen the latest DOSH visit recorded dated 17/08/2020 at Mill, 02/07/2019 at Jendarata Estate and 10/09/2020 at Seri Pelangi Estate for the PMT/PMA renewal inspection been actioned accordingly.</p> | |
| <p>6.7.3</p> | <p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p> | <p>Appropriate personal protective equipment (PPE) been provided is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. Sampled PPE records were as below:</p> <p>Jendarata POM:</p> <ul style="list-style-type: none"> a) Safety helmet dated 17/09/2020 b) Safety Shoe dated 15/07/2020 c) Ear plug dated 11/07/2020 <p>Jendarata Estate:</p> <ul style="list-style-type: none"> a) Nitrile Glove dated 14/09/2020 b) Respirator Mask dated 03/09/2020 c) Apron dated 08/08/2020 d) Anti Fog Google dated 24/12/2019 <p>Seri Pelangi Estate:</p> <ul style="list-style-type: none"> a) Oil Resistant Shoe dated 20/07/2020 b) Wellington Shoe dated 04/09/2020 c) Face Mask dated 26/08/2020 d) Nitrile Glove dated 04/09/2020 e) Apron dated 04/09/2020 | <p>Complied</p> |

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| 6.7.4 | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p> | <p>Medical care and accident insurance are provided to all the employees. Workers are covered under SOCSO scheme. Seen the SOCSO scheme payment schedule at Jendarata POM, Jendarata Estate and Seri Pelangi Estate for June 2020, July 2020 & August 2020. Above Sosco submission were done using the Borang 8A. Details of the Employer and worker's details been available accordingly.</p> | Complied |
| 6.7.5 | <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p> | <p>Records on Lost Time Accident (LTA) metrics at Jendarata POM and estates had been verified. Details as follows:</p> <p>Jendarata POM: JKPP 8 been submitted to DOSH annually with latest done Ref No. JKPP 8/46898/2019 submitted for year ending 2019 to DOSH on 11/01/2020.</p> <p>Jendarata Estate: JKPP 8 been submitted to DOSH annually. Seen the JKPP 8 submission for year ending 2019 to DOSH on 29/01/2020.</p> <p>Seri Pelangi Estate: JKPP 8 been submitted to DOSH annually. Seen the JKPP 8 submission for year ending 2019 to DOSH on 16/01/2020.</p> | Complied |
| <p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p> | | | |
| <p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p> | | | |
| 7.1.1 | <p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p> | <p>IPM plans are implemented and monitored as per established IPM in Field Management Manual (Supplements), Section S2-S.2.2 Integrated Pest Management:</p> <ul style="list-style-type: none"> - Beneficial flowering plants: e.g. Cassia Cobanensis, Antignon Leptosus etc. - Natural control agents: e.g. Sycanus dichotomus, Eucanthocona sp <p>Monitoring record available as per Total IPM Planted as of January 2020:</p> <ul style="list-style-type: none"> - Cassia cobanensis: 75 seedlings | Complied |

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| | | <ul style="list-style-type: none"> - Tunera subulate/ulmfolia: 2,537 seedlings - Antignon leptosus: 32 seedlings - Carambola sp: 13 seedlings - Others: 10 seedlings | |
| 7.1.2 | <p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p> | <p>The estates conducted assessment on list of species invasiveness used for biological control. No invasive species listed in the CABI.org introduced in the estate.</p> <p>Flora species were used for IPM such as Tunera subulata, Cassia cobanensis, Antigonan leptopus and Euphorbia heterophylla.</p> <p>Fauna species were used for IPM were Tyto alba.</p> | Complied |
| 7.1.3 | <p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p> | No evidence and records of fire usage for pest control at both estates visited. | Complied |
| Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | |
| 7.2.1 | <p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p> | <p>Justification of all pesticides used was defined in the Chemical Register.</p> <p>Among the information available is type of spraying operations and its type of chemical used e.g.:</p> <ul style="list-style-type: none"> a) Circle spray (mature) – e.g. glyphosate + amine + methylsulfuron • Circle spray (immature) – e.g. Basta (a.i.: glufosinate isophrophylamine) b) Bagworm & rhino beetles treatment – e.g. cypemethrin (turbomiser) c) Rat baiting – e.g. warfarin d) Cover crop spray – e.g. fusillade | Complied |

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| 7.2.2 | <p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p> | <p>Jendarata Estate & Seri Pelangi Estate continued to maintain their records of pesticides consumption and updated on monthly basis. The information about LD50, and a.i. applied per ha was available for verification.</p> | Complied |
| 7.2.3 | <p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p> | <p>The estates has implemented a Continuous Improvement Plan FY 2020 where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p> | Complied |
| 7.2.4 | <p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p> | <p>There was no prophylactic use of pesticides in the estates. The application of pesticides was based on level of attack severity which was normally obtained through census.</p> | Complied |
| 7.2.5 | <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative | <p>Based on chemical register dated 18/08/2020, no WHO class IA and IB used. The used of Paraquat is banned. Only class II, III and IV chemical used in the estates. At Seri Pelangi estate Monocrotophos (Class 1B) was previously used for bagworm. However, it has been stopped purchased and replaced with Acephate (Class II).</p> | Complied |

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| | <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p> | | |
| 7.2.6 | <p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p> | <p>Pesticides operators for all estates visited has been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators has been given training regarding the usage safety and health issue and proper way for chemical application by the plantation executives, manager, and asst. manager and chemical supplier with knowledge on chemical handling and applications.</p> | Complied |
| 7.2.7 | <p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p> | <p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p> | Complied |
| 7.2.8 | <p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p> | <p>Jendrata Estate & Seri Pelangi Estate:</p> <p>All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the DOE approved licensed waste collector Enviro Green Plas Enterprise The last disposal was dated 19/08/2020.</p> | Complied |

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| 7.2.9 | <p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p> | Pesticide application by aerial spraying is not practiced by the United Plantations Berhad. | Complied |
| 7.2.10 | <p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p> | <p>Jendarata Estate Annual Medical Surveillance has been conducted accordingly on 14/02/2020, 21/02/2020 & 28/02/2020 for all workers exposed to related chemicals including pesticide operators as per CHRA recommendation. The Medical Surveillance conducted for 84 workers by DOSH Reg. OHD No. HQ/12/DOC/00/279. Results indicates all 84 workers were fit to work. No pregnant/nursing workers were involved in pesticide handling works.</p> <p>Seri Pelangi Estate Annual Medical Surveillance has been conducted accordingly on 13/05/2020 or all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 25 workers by DOSH Reg. OHD No. HQ/12/DOC/00/279. Results indicates all 25 workers were fit to work. No pregnant/nursing workers were involved in pesticide handling works.</p> | Complied |
| 7.2.11 | <p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p> | No women sprayer at Jendarata Estate and Seri Pelangi Estate. | Complied |
| <p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p> | | | |
| 7.3.1 | <p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> | <p>Waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented accordingly:</p> | Complied |

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| | - Minor compliance - | <p>Palm oil mill - Type of waste generated:</p> <ul style="list-style-type: none"> - Scheduled waste (e.g. SW305, SW409 and SW410) domestic waste and recyclable waste. These categories include: Palm Oil Mill Effluent, Empty Fruit Bunch, Boiler Ash. The waste management plan was adequately addressed and updated dated August 2020. <p>Type of waste at Estates:</p> <ul style="list-style-type: none"> - Scheduled waste – SW102, SW305, , SW409, SW410, SW 404 <p>Waste generated from workshop, clinic, SW store, store;</p> <ul style="list-style-type: none"> - Domestic waste – rubbish & sewage – line-site, office, workshop, store, shop & - Recycle waste – empty container, waste oil - Industrial waste – Scrap iron <p>Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly</p> | |
| 7.3.2 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p> | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Interview with the waste material handling workers demonstrates adequate understanding on proper disposal of waste material, according to procedures.</p> | Complied |
| 7.3.3 | <p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p> | <p>Visit to the mill and estate offices as well as housing area shown no open fire been use for waste disposal.</p> | Complied |
| <p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p> | | | |
| 7.4.1 | <p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p> | <p>Good agriculture practices are followed as per established Field Management Manual; Dated 29/12/2004 for all operational activities.</p> | Complied |

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| 7.4.2 | <p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p> | <p>Periodic tissue and soil sampling conducted by United Plantation Research Department (UPRD) for Jendarata Estate as following:</p> <ul style="list-style-type: none"> - Result of Leaf Analysis Commercial Field Foliar Samples records; Lab Test # A007/20; Date collected 20/11–31/12/2019; Date received: 01/02/2020; Date analysed: 06/04/-05/06/2020; Report date: 05/06/2020 - Result of Soil Analysis; Lab Test # E002/18; Date received: 08/03/2018; Date Analysed: 09-14/03/2018 | Complied |
| 7.4.3 | <p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p> | <p>Supply of EFB was quite limited due to mill usage for boiler fuel. Thus, the application of EFB in the estates was done in a small scale. Application of POME was carried out through land application. Records shown a total of 98,845 m³ POME has been applied for this year until August 2020. However, implementation of POME land application through furrow system in Jendarata Estate as part of nutrient recycling strategy in place could be strategized further. Hence, and OFI has been raised.</p> | Complied |
| 7.4.4 | <p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p> | <p>Records of fertiliser inputs were maintained as per sample table Year 2020 Fertiliser Recommendation (Rates in Kg. per Palm) dated 19/09/2019 for Jendarata Estate. Depends on field, planting year and soil type, different rate of dosage was applied. Based on the records of recommendation and application, sighted sample as following:</p> <ul style="list-style-type: none"> - Field # 6; Planting year: 2012; Soil type: Jawa; Area: 36.80 ha; Fertilizer (Urea) dos: 0.8 kg/palm x 2 cycle/year; Completed date: 09/08/2020 - Field # 3; Planting year: 2014; Soil type: Sedu; Area: 40.50 ha; Fertilizer (NK) dos: 3.0 kg/palm x 1 cycle/year; Completed date: 14/03/2020 | Complied |
| Criterion 7.5: Practices minimise and control erosion and degradation of soils. | | | |
| 7.5.1 | <p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p> | <p>Maps identifying marginal and fragile soils, including steep terrain, are available as per following:</p> | Complied |

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| | | <ul style="list-style-type: none"> - Peat Soil Map – Jendarata Estate United Plantations Berhad; Source: Detailed Soil Survey; Mapped by; Vijandran JR; Projection: Long-Lat; Datum: WGS 1984; Date: October 2019 - Topographic Map – Jendarata Estate United Plantations Berhad; Mukim Hutan Melintang; Hilir Perak District; Perak Darul Ridzuan by JUPEM confirmed no steep terrain within Jendarata Estate | |
| 7.5.2 | <p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p> | <p>The management strategy for planting on slopes between 9 and 25 degrees is addressed in the land preparation procedure (planting and replanting). The major method to minimise soil erosion was construction of terrace. Avoidance of bare soil was done through establishment of low cover crop.</p> | Complied |
| 7.5.3 | <p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p> | <p>No new planting conducted at both estates visited.</p> | Complied |
| <p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p> | | | |
| 7.6.1 | <p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p> | <p>Soil maps were made available for the estates. Example, based on the soil map at Jendarata Estate, the soil type is Primaluck Series (moderately deep peat 3'-9'), Penor Series (shallow peat <3'), Sabrang Series, Sedu Series, Jawa Series, Selangor Series and Briah Series. Soil type at Sri Pelangi is all mineral. Identified marginal and fragile soils are Peat among Penor & Primaluck covering an estimated 1073.5 ha of total Jendarata Estate area.</p> | Complied |
| 7.6.2 | <p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p> | <p>Identified marginal and fragile soils are peat among Penor & Primaluck covering an estimated 1073.5 ha of total Jendarata Estate area. As of current, an estimated 845.60 ha of peat area has been planted with proper establishment of soil management plan including peat subsidence monitoring and water management through drainage weir establishment.</p> | Complied |

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| 7.6.3 | <p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p> | <p>The soil surveys and topographic information has been guided the planning of drainage and irrigation systems, roads and other infrastructure as per maps identifying marginal and fragile soils, including steep terrain, are available as per following:</p> <ul style="list-style-type: none"> - Peat Soil Map – Jendarata Estate United Plantations Berhad; Source: Detailed Soil Survey; Mapped by; Vijandran JR; Projection: Long-Lat; Datum: WGS 1984; Date: October 2019 - Topographic Map – Jendarata Estate United Plantations Berhad; Mukim Hutan Melintang; Hilir Perak District; Perak Darul Ridzuan by JUPEM confirmed no steep terrain within Jendarata Estate | Complied |
| Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | |
| 7.7.1 | <p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p> | <p>Neither new planting on peat regardless of depth after 15 November 2018 in existing nor any new development areas. Replanting on peat area still pending decision based on the assessment as per Drainability Assessment Report of Selected United Plantation Berhad’s Estates In Perak Darul Ridzuan, Malaysia May 2019/ Nov 2019 by Param Agricultural Soil Surveys (M) Sdn. Bhd.:</p> <ul style="list-style-type: none"> - Jendarata Estate - United International Enterprise (UIE) Oil Palm Estate - Ulu Basir Estate - Ladang Sungei Erong/Sungei Chawang Estate - Tanarata Estate | Complied |
| 7.7.2 | <p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> | <p>Areas of peat within the managed areas are inventoried, documented and reported as per RSPO Peat Inventory Template 05/06/2020 for following United Plantation estates:</p> <ul style="list-style-type: none"> - UIE Estate - Jendarata Estate - Ulu Bernam Estate | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

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| | - Minor compliance - | <ul style="list-style-type: none"> - Ulu Basir Estate - PT Suria Sawit Sejati Estate <p>Total peat area UP Down River BU 1,073.5 ha & Total Malaysia & Indonesia peat area: 5,411.24 ha</p> <p>Report has been received by RSPO through Email acknowledgement dated 05/06/2020 by RSPO PLWG (Devala Devi & Amir Afham).</p> | |
| 7.7.3 | <p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p> | <p>Subsidence of peat is monitored, documented and minimised as per sample monitoring records sighted as following:</p> <ul style="list-style-type: none"> - Peat Probe Location Map – Field Map – 6 probes (179 ha/probe) - Piezometer Location Map – Field Map – 9 piezometers (119 ha/piezometers) | Complied |
| 7.7.4 | <p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p> | <p>A documented water and ground cover management programme is in place as per UPB In-House Field Management Manual 2004 – Peat Area Management.</p> | Complied |
| 7.7.5 | <p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> | <p>Replanting on peat area still pending decision based on the assessment as per Drainability Assessment Report of Selected United Plantation Berhad’s Estates In Perak Darul Ridzuan, Malaysia May 2019/ Nov 2019 by Param Agricultural Soil Surveys (M) Sdn. Bhd.:</p> <ul style="list-style-type: none"> - Jendarata Estate - United International Enterprise (UIE) Oil Palm Estate - Ulu Basir Estate - Ladang Sungei Erong/Sungei Chawang Estate - Tanarata Estate | Complied |

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| | <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p> | | |
| 7.7.6 | <p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | <p>All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance as per records of Irrigation and Water Management Map Jendarata Estate as following:</p> <ul style="list-style-type: none"> - Watergates total: 15; Density: 1:425 ha - Weirs total: 127; Density: 1:50 ha - Water pump total 2 main canals <p>Rain harvesting; Rainfall records todate September 2020 1648.6 mm; 2019: 2001 mm; 2018: 1910 mm</p> | Complied |
| 7.7.7 | <p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | <p>All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance as per records of Irrigation and Water Management Map Jendarata Estate. No any new drainage, building and power lines available within unplanted peat areas.</p> | Complied |
| Criterion 7.8: Practices maintain the quality and availability of surface and groundwater. | | | |
| 7.8.1 | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> | <p>Water management plan has been established and documented accordingly. The plan addresses on the unit of certification does not restrict access to clean water or contribute to pollution of water used by communities including Workers have adequate access to clean water.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|--|--|-----------------|
| | <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p> | <p>Details of Water Consumption at Mill as per the water management plan were monitored on monthly basis with data available up to date until August 2020.</p> <p>Jendarata Estate & Seri Pelangi Estate:</p> <p>Water Management has been established accordingly. Details of water management program for year 2020 includes:</p> <p>a) To ensure the water pump house/drawing facility is maintained in good condition e.g. no leakages/diesel contamination.</p> <p>b) To monitor the water usage of linesite on monthly basis.</p> <p>c) To perform periodic monitoring of the untreated and treated water.</p> | |
| <p>7.8.2</p> | <p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p> | <p>The estates have maintained its established riparian reserves mainly by avoidance of agrochemical usage at the designated zones. The water quality was also regularly monitored as follows:</p> <p>Jendarata Estate:</p> <p>River water sampling done at upstream & downstream Bernam River including Jendarata Canal at Field 50. Among the parameters tested for water quality were pH, BOD, COD, TSS, O&G, DO, AN and E.Coli. Last sampling was done on 29/11/19 (Jendarata Estate) and analysis was done by BP Food Environmental Testing (SAMM No. 573). The report (BBR00107,00108, 00109/1219E) was sighted and verified. Monitoring of the river water condition were done accordingly based on the result from the upstream & downstream test results.</p> <p>Seri Pelangi Estate:</p> <p>River water sampling done at upstream & downstream Sungkai River. Among the parameters tested for water quality were pH, BOD, COD, TSS, O&G, DO, AN and E.Coli. Sampling water analysis report available dated 14/01/20 analysis was done by BP Food Environmental Testing (SAMM No. 573). The report (BBR01381, 01382, 01383) was sighted and verified. Monitoring of the</p> | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | river water condition were done accordingly based on the result from the upstream & downstream test results. | | | | | | | | | |
|--|---|---|----------|-----------------------|---------|------|---------|------|--------|------|----------|
| 7.8.3 | Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance - | Treated POME discharge was regularly monitored as prescribed under "Jadual Pematuhan". Limit of Biochemical Oxygen Demand (BOD) discharge is within the allowable limit. Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance. Sampled the 3rd Quarter Effluent Lab Report No. LW/0820/1106 (1) dated 24/8/20. Verified that BOD discharge level was within the approved limit. | Complied | | | | | | | | |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. - Minor compliance - | <p>Mill water use per tonne of FFB is monitored and recorded accordingly as per in the Water Consumption Summary 2020. Data monitored on monthly basis and available for January 2020 – August 2020. Sampled as follows:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Month</th> <th>Water consumption/FFB</th> </tr> </thead> <tbody> <tr> <td>June-20</td> <td>0.74</td> </tr> <tr> <td>July-20</td> <td>0.51</td> </tr> <tr> <td>Aug-20</td> <td>0.49</td> </tr> </tbody> </table> | Month | Water consumption/FFB | June-20 | 0.74 | July-20 | 0.51 | Aug-20 | 0.49 | Complied |
| Month | Water consumption/FFB | | | | | | | | | | |
| June-20 | 0.74 | | | | | | | | | | |
| July-20 | 0.51 | | | | | | | | | | |
| Aug-20 | 0.49 | | | | | | | | | | |
| Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised | | | | | | | | | | | |
| 7.9.1 | A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance - | The certification unit has adequate plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented accordingly. Sampled details included as follows: Jendarata POM and estates: Monitoring of Fossil Fuel Usage (Petrol & Diesel) per Ton of FFB available and monitored on monthly basis. Detail of Diesel Use Per Ton of FFB has been verified accordingly from January-20 until August -20. | Complied | | | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. | | | | | | | | | | | | | | | | | | |
|---|--|---|----------------|--------|-------|--------------------|-----------------------|-----------------------|-----------------|----------------------|-----------------------|-----------------|----------------------|-----------------------|----|----------------------|-----------------------|----------|
| 7.10.1 | <p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p> | <p>GHG emissions are identified and assessed as per Environmental Risk Assessment (ERA) was last reviewed on 10/08/2020 for both estate and mill. Plan to reduce or minimise implemented includes monitoring as per sample sighted for Isokinetic Stack and Air Emission Monitoring.</p> <p>Isokinetic Stack and Air Emission Monitoring Report Prepared for Jendarata Palm Oil Mill, United Plantation Berhad. Monitoring date: 01/07/2020; Reporting date: 10/07/2020; Report ref. #RT033/2020/039; Results as following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Test parameter</th> <th>Result</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>Dust concentration</td> <td>131 mg/m³</td> <td>150 mg/m³</td> </tr> <tr> <td>NO₂</td> <td>81 mg/m³</td> <td>500 mg/m³</td> </tr> <tr> <td>SO₂</td> <td>42 mg/m³</td> <td>500 mg/m³</td> </tr> <tr> <td>CO</td> <td>97 mg/m³</td> <td>200 mg/m³</td> </tr> </tbody> </table> | Test parameter | Result | Limit | Dust concentration | 131 mg/m ³ | 150 mg/m ³ | NO ₂ | 81 mg/m ³ | 500 mg/m ³ | SO ₂ | 42 mg/m ³ | 500 mg/m ³ | CO | 97 mg/m ³ | 200 mg/m ³ | Complied |
| Test parameter | Result | Limit | | | | | | | | | | | | | | | | |
| Dust concentration | 131 mg/m ³ | 150 mg/m ³ | | | | | | | | | | | | | | | | |
| NO ₂ | 81 mg/m ³ | 500 mg/m ³ | | | | | | | | | | | | | | | | |
| SO ₂ | 42 mg/m ³ | 500 mg/m ³ | | | | | | | | | | | | | | | | |
| CO | 97 mg/m ³ | 200 mg/m ³ | | | | | | | | | | | | | | | | |
| 7.10.2 | <p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p> | <p>No new development within both Jendarata Estate and Seri Pelangi Estate.</p> | Complied | | | | | | | | | | | | | | | |
| 7.10.3 | <p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> | <p>Other significant pollutants identified with plans to reduce or minimise them implemented and monitored accordingly. For mill POME final discharge as per DOE license compliance schedule for water course discharge BOD limit @ 100</p> | Complied | | | | | | | | | | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|--|----------|
| | - Critical (Major) compliance - | <p>mg/l and 5,000 mg/l for land application with 10:90 ratio. Land application discharge from sample analysis sighted as following:</p> <ul style="list-style-type: none"> - Certificate of Analysis Lab Report # LW/0820/1106(1); Sample date: 12/08/2020; Report date: 24/08/2020; Final discharge BOD: 571 mg/l - Certificate of Analysis Lab Report # LW/0820/1106(1); Sample date: 15/07/2020; Report date: 27/07/2020; Final discharge BOD: 698 mg/l <p>Visit to effluent treatment ponds shown no discharge from Aerobic Pond # 6 (water course). Treated POME for Land application shown sample for September 2020 was sent for analysis on 08/09/2020 as per sample delivery note # 122133.</p> <p>Online Environmental Reporting was submitted latest on 01/09/2020.</p> | |
| Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area | | | |
| 7.11.1 | <p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p> | No fire was used for preparation of land. Verification on the latest replanting fields confirmed that no trace of open burning observed | Complied |
| 7.11.2 | <p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p> | The fire prevention procedure have been established to ensure no fire breakout happen in estate. Fire drill and fire extinguishing training for emergency team in collaboration with local authority. | Complied |
| 7.11.3 | <p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p> | The management already approach the stakeholder during stakeholder consultation meeting regarding to fire prevention and control measure. | Complied |
| Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. | | | |

| | | | |
|---------------|--|--|-----------------|
| <p>7.12.1</p> | <p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p> | <p>There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018.</p> | <p>Complied</p> |
| <p>7.12.2</p> | <p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p> | <p>There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018. For existing plantings, identification made as per assessment report i.e. A Conservation Assessment of United Plantation Perak Estates Conservation Values & Recommendations; A Report Prepared by Wild Asia; Wild Asia’s Sustainable Agriculture Initiative; Report Dated: 14/1/2008. Identified potential conserved area:</p> <ul style="list-style-type: none"> - Riverine Forests (Riparian Buffer Zone) – along Sg. Bernam - Riverine backswamps and marshlands – along Sg. Bernam - Lowland dryland & peat swamp forests - Settlement areas, canals and open water bodies <p>Developed HCV Assessment – Jendarata Estate:</p> <ul style="list-style-type: none"> - Firefly conservation - Riparian reserve - Bernam river <p>Action plan:</p> <ul style="list-style-type: none"> - HCV/Conservation Area Monitoring Checklist - Monitoring as per Wildlife Sightings Book | <p>Complied</p> |

| | | | |
|--------|---|---|----------------|
| 7.12.3 | <i>Indicator is not applicable in Malaysia context</i> | Not applicable | Not Applicable |
| 7.12.4 | <p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p> | There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018. For existing plantings, identification made as per assessment report i.e. A Conservation Assessment of United Plantation Perak Estates Conservation Values & Recommendations; A Report Prepared by Wild Asia; Wild Asia’s Sustainable Agriculture Initiative; Report Dated: 14/01/2008. | Complied |
| 7.12.5 | <p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p> | There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018. For existing plantings, identification made as per assessment report i.e. A Conservation Assessment of United Plantation Perak Estates Conservation Values & Recommendations; A Report Prepared by Wild Asia; Wild Asia’s Sustainable Agriculture Initiative; Report Dated: 14/01/2008. Identified potential conserved area: | Complied |
| 7.12.6 | <p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national</p> | There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018. For existing plantings, identification made as per assessment report i.e. A Conservation Assessment of United Plantation Perak Estates Conservation Values & Recommendations; A Report Prepared by Wild Asia; Wild Asia’s Sustainable Agriculture Initiative; Report Dated: 14/01/2008. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | <p>law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p> | <p>Monitoring implemented as per Wildlife Sightings Book in Jendarata Estate (JE) and Seri Pelangi Estate (SPE) as per following samples respectively:</p> <table border="1" data-bbox="1012 434 1559 887"> <thead> <tr> <th>Wildlife</th> <th>Location</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Flies</td> <td>JE</td> <td>14/09/2020</td> </tr> <tr> <td>Hornbill</td> <td>JE</td> <td>02/09/2020</td> </tr> <tr> <td>Eagle</td> <td>JE</td> <td>01/08/2020</td> </tr> <tr> <td>Turtle</td> <td>JE</td> <td>01/08/2020</td> </tr> <tr> <td>Phyton</td> <td>Field 5, SPE</td> <td>22/01/2020</td> </tr> <tr> <td>Scorpion</td> <td>SQ 6, SPE</td> <td>20/07/2019</td> </tr> <tr> <td>Hornbill</td> <td>MB01, SPE</td> <td>17/07/2019</td> </tr> </tbody> </table> <p>Education programs to workforce on RTE and biodiversity were regularly made from time to time through briefings in weekly assembly in Jenderata Mill and daily muster rollcall in Jenderata Estate as well as Seri Pelangi Estate. Sighted the sample records of briefing conducted as per sessions as following:</p> <ul style="list-style-type: none"> - Jenderata Palm Oil Mill weekly assembly briefing date: 12/09/2020 - Jendarata Estate daily muster rollcall briefing date: 28/02/2020 - Seri Pelangi Estate daily muster rollcall briefing date: 19/08/2020 | Wildlife | Location | Date | Fire Flies | JE | 14/09/2020 | Hornbill | JE | 02/09/2020 | Eagle | JE | 01/08/2020 | Turtle | JE | 01/08/2020 | Phyton | Field 5, SPE | 22/01/2020 | Scorpion | SQ 6, SPE | 20/07/2019 | Hornbill | MB01, SPE | 17/07/2019 | |
|------------|---|---|----------|----------|------|------------|----|------------|----------|----|------------|-------|----|------------|--------|----|------------|--------|--------------|------------|----------|-----------|------------|----------|-----------|------------|--|
| Wildlife | Location | Date | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fire Flies | JE | 14/09/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hornbill | JE | 02/09/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Eagle | JE | 01/08/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Turtle | JE | 01/08/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Phyton | Field 5, SPE | 22/01/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Scorpion | SQ 6, SPE | 20/07/2019 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hornbill | MB01, SPE | 17/07/2019 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.12.7 | <p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p> | <p>There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018. For existing plantings, identification made as per assessment report i.e. A Conservation Assessment of United Plantation Perak Estates Conservation Values & Recommendations; A Report Prepared by Wild Asia; Wild Asia’s Sustainable Agriculture Initiative; Report Dated: 14/01/2008.</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>Monitoring implemented as per Wildlife Sightings Book in Jendarata Estate (JE) and Seri Pelangi Estate (SPE) as per following samples respectively:</p> <table border="1" data-bbox="1012 435 1561 885"> <thead> <tr> <th>Wildlife</th> <th>Location</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Flies</td> <td>JE</td> <td>14/09/2020</td> </tr> <tr> <td>Hornbill</td> <td>JE</td> <td>02/09/2020</td> </tr> <tr> <td>Eagle</td> <td>JE</td> <td>01/08/2020</td> </tr> <tr> <td>Turtle</td> <td>JE</td> <td>01/08/2020</td> </tr> <tr> <td>Phyton</td> <td>Field 5, SPE</td> <td>22/01/2020</td> </tr> <tr> <td>Scorpion</td> <td>SQ 6, SPE</td> <td>20/07/2019</td> </tr> <tr> <td>Hornbill</td> <td>MB01, SPE</td> <td>17/07/2019</td> </tr> </tbody> </table> | Wildlife | Location | Date | Fire Flies | JE | 14/09/2020 | Hornbill | JE | 02/09/2020 | Eagle | JE | 01/08/2020 | Turtle | JE | 01/08/2020 | Phyton | Field 5, SPE | 22/01/2020 | Scorpion | SQ 6, SPE | 20/07/2019 | Hornbill | MB01, SPE | 17/07/2019 | |
|------------|---|---|----------|----------|------|------------|----|------------|----------|----|------------|-------|----|------------|--------|----|------------|--------|--------------|------------|----------|-----------|------------|----------|-----------|------------|--|
| Wildlife | Location | Date | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fire Flies | JE | 14/09/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hornbill | JE | 02/09/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Eagle | JE | 01/08/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Turtle | JE | 01/08/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Phyton | Field 5, SPE | 22/01/2020 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Scorpion | SQ 6, SPE | 20/07/2019 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hornbill | MB01, SPE | 17/07/2019 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.12.8 | <p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -</p> | <p>There was no land clearing made within both visited estates since November 2005 or Land clearing since 15 November 2018.</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Appendix B: Approved Time Bound Plan

| Name of Business Unit | Location | Date of First Certification | End Date of Certification | Certificate Number | Remarks |
|--|--|------------------------------------|----------------------------------|---------------------------|--|
| Jendarata Business Unit | Teluk Intan, Perak | 21/08/2008 | 28/09/2022 | RSPO 693200 | - |
| United International Enterprises Business Unit | Pantai Remis, Perak | 29/09/2012 | 28/09/2022 | RSPO 693198 | - |
| Ulu Basir Business Unit | Ulu Bernam, Perak | 29/09/2012 | 28/09/2022 | GGC-UPBUB-RSPO-AA2-2019 | - |
| Ulu Bernam Optimill Business Unit | Ulu Bernam, Perak | 29/09/2012 | 28/09/2022 | GGC-UPBUBO-RSPO-AA1-2019 | - |
| PT Surya Sawit Sejati (PT SSS) Lada Business Unit | Pengkalan Lada Sub District, Kotawaringin Barat District, Central Kalimantan | 27/11/2018 | 26/11/2023 | MUTU-RSPO/123 | - |
| Plasma Smallholder PT SSS (Plasma Kumai & Plasma Arut) | Pengkalan Bun, Kotawaringin Barat District, Central Kalimantan | N/A | N/A | N/A | The RSPO certification for scheme smallholders of PTSSS is subject to the issuance of land use certificate (SK Bupati). The timeline on issuance of land use certificate is beyond the control of Company. However, the company declared the scheme smallholders to be certified by 2023 in ACOP 2019. |
| Tanarata Estate | Teluk Intan, Perak | N/A | N/A | N/A | The date of acquisition for Tanarata Estate is 17th August 2019. In compliance with the RSPO P&C Certification System, United Plantations Berhad anticipate to conduct the RSPO Scope Extension Assessment for Tanarata Estate within three (3) years, which is in August 2022. Tanarata Estate |

**RSPO P&C Public Summary Report
Revision 10 (Mar 2020)**

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| | | | | | will be the supply base of Jendarata Palm Oil Mill (RSPO Identity Preserved model) upon obtaining the RSPO certification. |
|--|--|--|--|--|---|

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2019** for **Jendarata POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2019** for **Jendarata POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 2.19 |
| PKO | 2.19 |

| Extraction | % |
|------------|-------|
| OER | 22.59 |
| KER | 5.10 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 130,718.28 |
| CPO Produced | 29,529.26 |
| PKO Produced | 6,666.63 |

| Land Use | Ha |
|-----------------------------|-----------------|
| OP Planted Area | 5,776.40 |
| OP Planted on peat | 845.60 |
| Conservation (forested) | 0.00 |
| Conservation (non-forested) | 0.00 |
| Total | 6,622.00 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 52,192.19 | 0.49 | 13,198.99 | 0.54 | 0.00 | 0.00 | 65,391.18 | 1.03 |
| CO ₂ Emission from fertilizer | 15,362.03 | 0.14 | 3,747.29 | 0.15 | 0.00 | 0.00 | 19,109.32 | 0.29 |
| NO ₂ Emission | 8,278.86 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 | 8,278.86 | 0.06 |
| Fuel Consumption | 1,561.07 | 0.01 | 203.36 | 0.01 | 0.00 | 0.00 | 1,764.43 | 0.02 |
| Peat Oxidation | 46,169.76 | 0.43 | 0.00 | 0.00 | 0.00 | 0.00 | 46,169.76 | 0.43 |
| Sink | | | | | | | | |
| Crop Sequestration | -49,476.76 | -0.47 | -12,516.64 | -0.51 | 0.00 | 0.00 | -61,993.40 | -0.98 |
| Conservation Sequestration | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | | | | |
|--------------|------------------|-------------|-----------------|-------------|-------------|-------------|------------------|-------------|
| Total | 74,087.15 | 0.70 | 5,029.81 | 0.21 | 0.00 | 0.00 | 79,116.96 | 0.91 |
|--------------|------------------|-------------|-----------------|-------------|-------------|-------------|------------------|-------------|

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 2,368.44 | 0.02 |
| Fuel Consumption | 162.61 | 0.00 |
| Grid Electricity Utilization | 0.00 | 0.00 |
| Credit | | |
| Export of Grid Electricity | -2,190.36 | -0.02 |
| Sales of PKS | 0.00 | 0.00 |
| Sales of EFB | 0.00 | 0.00 |
| Total | 340.70 | 0.00 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO₂e |
|--------------------------------|-------------------------|
| PK from own mill | 0.00 |
| PK from other source | 0.00 |
| Fuel Consumptions | 0.00 |
| Total Crusher emissions | 0.00 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|--------|
| Divert to Compost (%) | 0.00 |
| Divert to anaerobic diversion (%) | 100.00 |

| POME Diverted to Anaerobic Digestion: | |
|--|--------|
| Divert to anaerobic pond (%) | 0.00 |
| Divert to methane captured (flaring) (%) | 0.00 |
| Divert to methane captured (energy generation) (%) | 100.00 |

Appendix D: Supply Chain Declaration

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1 | June 2019 | 10,017.35 | - | 10,017.35 |
| 2 | July 2019 | 10,898.22 | - | 10,898.22 |
| 3 | August 2019 | 12,813.90 | - | 12,813.90 |
| 4 | September 2019 | 11,115.73 | - | 11,115.73 |
| 5 | October 2019 | 10,612.05 | - | 10,612.05 |
| 6 | November 2019 | 10,324.18 | - | 10,324.18 |
| 7 | December 2019 | 8,874.06 | - | 8,874.06 |
| 8 | January 2020 | 9,342.51 | - | 9,342.51 |
| 9 | February 2020 | 11,853.71 | - | 11,853.71 |
| 10 | March 2020 | 12,408.74 | - | 12,408.74 |
| 11 | April 2020 | 13,899.11 | - | 13,899.11 |
| 12 | May 2020 | 10,633.16 | - | 10,633.16 |
| 13 | June 2020 | 12,329.55 | - | 12,329.55 |
| 14 | July 2020 | 10,992.58 | - | 10,992.58 |
| 15 | August 2020 | 12,604.00 | - | 12,604.00 |
| Total | | 168,718.85 | - | 168,718.85 |

| B. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | June 2019 | 2,345.17 | 489.70 |
| 2 | July 2019 | 2,537.60 | 563.67 |
| 3 | August 2019 | 2,930.28 | 666.29 |
| 4 | September 2019 | 2,501.05 | 586.58 |
| 5 | October 2019 | 2,329.61 | 534.93 |
| 6 | November 2019 | 2,256.54 | 497.65 |
| 7 | December 2019 | 1,922.13 | 459.77 |
| 8 | January 2020 | 2,086.86 | 487.95 |
| 9 | February 2020 | 2,638.12 | 659.31 |
| 10 | March 2020 | 2,785.02 | 670.46 |
| 11 | April 2020 | 3,153.29 | 747.92 |
| 12 | May 2020 | 2,484.95 | 579.39 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|-------------|------------------|-----------------|
| 13 | June 2020 | 2,810.53 | 578.03 |
| 14 | July 2020 | 2,499.47 | 535.80 |
| 15 | August 2020 | 2,851.31 | 613.48 |
| Total | | 38,131.93 | 8,670.93 |

| C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | |
|--|--------------------|--|--------------------------------|-------------------------------|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| 1 | XXXXX | TR-af3d69be-bd5e, TR-4e3bdc96-b01d, TR-4a2c7161-567e, TR-d0de40ad-7fd5, TR-3768c849-30c3, TR-4e3e4cd9-f59a, TR-c7d5d668-83af, TR-2c287849-5d25, TR-9dbc1480-c69b, TR-9235ec8a-ad6e, TR-28ec07e7-6214, TR-d95b9863-b83f, TR-00cd6f60-1ef8, TR-c00a86f0-eb62, TR-109ff2e5-70f9, TR-5fe362b9-73f3, TR-daa4f894-b866, TR-5483ba06-9f8b, TR-4a3fa95e-f37d, TR-25786bdd-9a3e, TR-b8d34e41-e156, TR-b6952dc3-356a, TR-f8433f0c-65fc, TR-1eccf296-dc3c, TR-3e8495ce-74a1, TR-ab44345a-75c3, TR-d2f3f9a0-03ef, TR-d1d68285-ec94, TR-70a4ec10-bc9d, TR-e48af82a-27ce, TR-f011c88a-a39a | - | 8,767.54 |
| 2 | ABC | TR-e716a51e-8539 | 46.83 | - |
| 3 | EFG | TR-fb27a80a-5782 | 47.36 | - |
| 4 | HIJ | TR-f53b0bd5-5834 | 119.28 | - |
| 5 | XXXXX | TR-58147852-d1b0, TR-871d3a18-917b, TR-5ee61ed8-7db4, TR-3ac5a8a5-ee58, TR-ad6a7755-028e, TR-1e8a34a4-9011, TR-bdecce7d-8c71, TR-b26a8598-1669, TR-f6f20859-6651, TR- | 36,941.07 | - |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | |
|--|--|---|--|--|
| | | <p>955f29cc-e46b, TR-80a6b027-6d37, TR-4a4569ba-bf17, TR-6c693743-1880, TR-35340d5d-3a3f, TR-e764ebfc-cf07, TR-0c4a92a5-0e6e, TR-b328f1c5-348f, TR-e310cf20-6771, TR-f85307c5-ae88, TR-8e8159ae-57aa, TR-d3efb9ce-1dfb, TR-cc2a2d32-5b6b, TR-55250140-2279, TR-8d361d79-1285, TR-94696364-8a41, TR-e58eceff-333d, TR-aa169f30-4e73, TR-83c8a29d-eabf, TR-238b4b89-228c, TR-8df42619-1c39, TR-ba0d224f-df15, TR-a19f7858-7511, TR-35559207-1769, TR-441937bb-5d10, TR-b5144bcf-46ea, TR-fb164262-8590, TR-8f4e1662-abfb, TR-7f97704e-7f44, TR-f0683f1c-afb8, TR-5fce5bd9-d06d, TR-fa137bf9-0e7c, TR-7608cc88-8c2d, TR-61b0bacd-94a3, TR-a681ae56-9e63, TR-4f53b356-9039, TR-9e4c84b8-9631, TR-1425f717-c7de, TR-7e618d98-debf, TR-92e13083-7d96, TR-e2c677f0-f98c, TR-842a7b31-25d8, TR-8c5a0881-f66c, TR-59788700-f40a, TR-a8730be0-6142, TR-1b0f38e1-4a26, TR-20022f53-b936, TR-34b9dcaf-020f, TR-25ccbed2-7983, TR-5fb7b3e8-f467, TR-fa9b6931-2b55, TR-b840d4a6-b85b, TR-afa3f377-fdb6, TR-78c4b535-1f7e, TR-a86aa75e-f0fd, TR-064a7fee-c597, TR-a24ebaae-07dc, TR-2c24a862-fa59, TR-</p> | | |
|--|--|---|--|--|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | |
|--|--|--|--|--|
| | | <p>c0f8c78c-d7bc, TR-8d93e756-44fe, TR-16064413-7664, TR-428a5a0f-781d, TR-7c7af15b-a59d, TR-84fd2ef1-ba66, TR-d483886c-ba2b, TR-0d814a43-eac8, TR-d6358c8c-9714, TR-6774ee76-e135, TR-07888df0-c025, TR-41264c78-9e2a, TR-5e8f7cfa-0f6a, TR-ba4a0024-1442, TR-5ab06e1e-c2be, TR-49ef483d-3c50, TR-70127edb-e354, TR-f471d9a5-7714, TR-fc941042-49c6, TR-64f54d5d-c42e, TR-1c5a6d10-b823, TR-5708acf4-1334, TR-66bb8871-a673, TR-beddd893-970f, TR-07add522-5782, TR-97936b00-387e, TR-61333803-0e22, TR-59854a65-4d98, TR-edcaa57c-b195, TR-05054d22-c307, TR-53a89167-da06, TR-d8b32e48-783e, TR-6ce999db-5e48, TR-4e5b710c-bdf0, TR-043af16a-f16e, TR-0f16c523-0008, TR-5a08c48d-d83f, TR-ffde3bb0-21c6, TR-ae5d4dbc-de98, TR-42f637e7-ca5a, TR-47a04986-5e1c, TR-a787227c-0deb, TR-d46804e9-10b3, TR-e94bbfa6-ea7d, TR-f6a33f20-8bdd, TR-d4cf8a75-2694, TR-87f73489-4529, TR-23cf7676-d570, TR-ca02fd77-1b31, TR-cfc9fe71-2f32, TR-a4a18231-16f7, TR-d11ffde6-f9ac, TR-143a473c-f6e0, TR-36a39cc8-d37c, TR-59ba7761-f431, TR-06b78911-d579, TR-4906d4b3-ac64, TR-ec84aa55-6506</p> | | |
|--|--|--|--|--|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | |
|--------------|------------------|-----------------|
| Total | 37,154.54 | 8,767.54 |
|--------------|------------------|-----------------|

| D. Records of CPO & PK Sold under other schemes since the last audit (if any) | | | | |
|--|--------------------|--------------------|----------------------|---------------------|
| No. | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
| N/A | | | | |

| E. Records of CPO & PK Sold as conventional since the last audit (if any) | | | |
|--|--------------------|----------------------|---------------------|
| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) |
| 1 | SOCSHIP A/C ISF | 419.62 | - |
| 2 | FLEET PALMS | 164.71 | - |
| 3 | FLEET PALMS | 160.00 | - |
| 4 | UNITED FLEET PALM | 303.39 | - |
| Total | | 1,047.72 | - |

| F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) | | | |
|--|--------------------|---|--|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (mt) |
| N/A | | | |

Appendix E: Location Map of Certification Unit and Supply bases



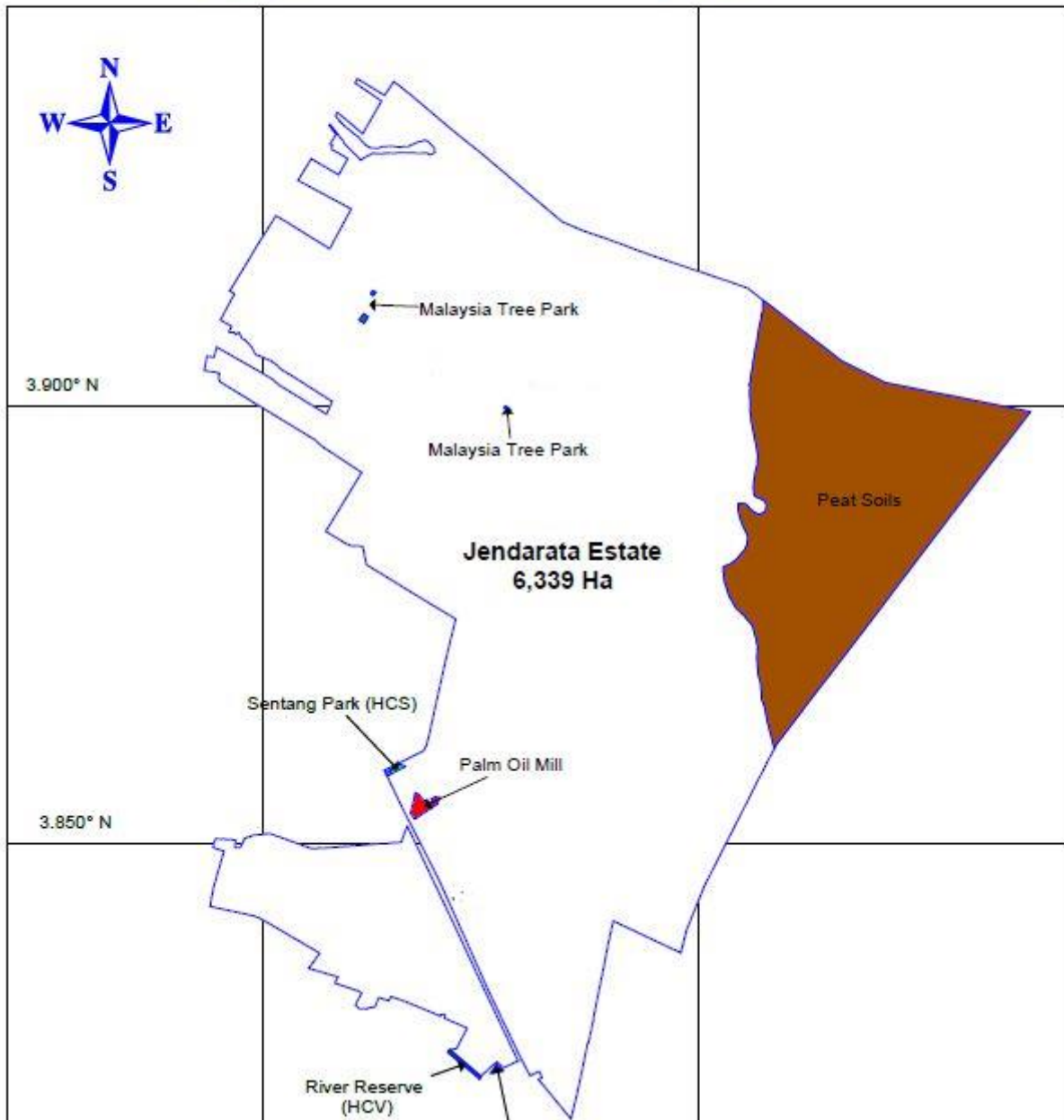
Appendix F: Estate Field Map



United Plantations Berhad
Jendarata Estate

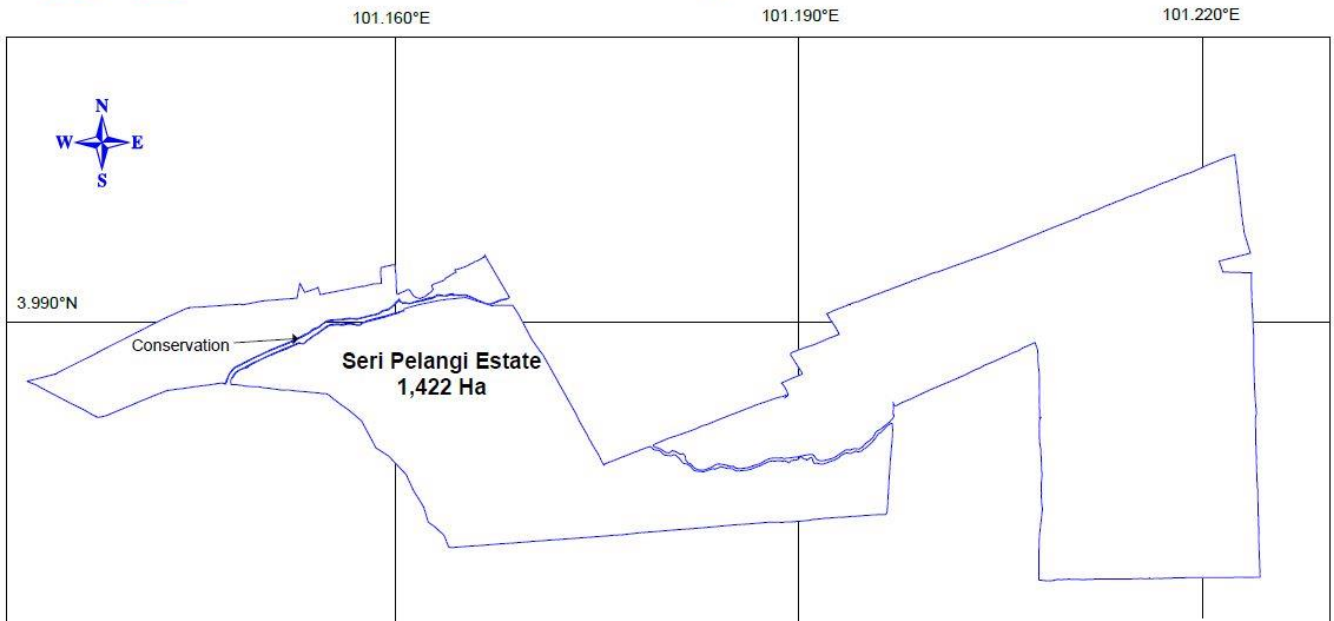
100.950° E

101.000° E





United Plantations Berhad
Seri Pelangi Estate



Appendix G: List of Smallholder Sampled

Not applicable.

Appendix H: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel 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 |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |