

MSPO ASSESSMENT REPORT - PART 4

Malaysian Sustainable Palm Oil Certification

MSPO - PART 4 (GENERAL PRINCIPLE FOR PALM OIL MILL)

[]Stage-1 [√] Stage-2 [] Surveillance [] Re-Certification

Plantation Management/Owner : United Plantations Bhd

Mill Name : Ulu Bernam Optimill

Location : Up River Business Unit, 35800 Slim River, Perak,

Malaysia.

Certificate Code : MUTU-MSPO/015

Date of certificate issue : 26/08/2018

Date of expiry of certificate : 25/08/2023

Assessment	Assessment	Mutuagung Lestari Malaysia	Review	Approve
	Date	Auditor	by	by
Main/ST-2 09 th July 2018		Mahaswaran Maliyapan (Lead Auditor), Ebnu Holdoon Shawal [Auditor], Khairul Anuar [Auditor]	Ganapathy Ramasamy / Peter	Hari Naveen Christopher

Assessment	Approved by MUTUAGUNG LESTARI MALAYSIA SDN BHD on:
Main/ST-2	26/08/18

Mutuagung Lestari Malaysia Sdn Bhd • B-09-26 Empire Soho • Subang Jaya • Petaling Jaya 47500 • Selangor • Malaysia Telephone (03) 50367280 • Fax (03) 50367290

Email: hari@mutucertification.com • www.mutucertification.com



	TABLE OF CONTENT LOCATION MAPS	
	Figure 1. Location and operation map of palm oil mill	03
1.0	SCOPE OF THE CERTIFICATION ASSESSMENT	
1.1	Assessment Standard Used	04
1.2	Organization Information	04
1.3	Mill and Supply Base(s) Information	04
1.4	Other Certifications	05
2.0	ASSESSMENT PROCESS	
2.1	Certification Body	05
2.2	Assessment Team	05
2.3	Assessment Methodology, Assessment Process and Locations of Assessment	06
2.4	Stakeholder Consultation	06
2.5	Determining Next Assessment	06
3.0	ASSESSMENT FINDINGS	
3.1	Summary of Assessment Report of the MSPO Certification	07-24
3.2	Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	25-29
3.3	Summary of Arising Issues from Stakeholders, Management and Auditor Responses	29-30
3.4	Summary of findings and recommendations	30
4.0	CERTIFIED ORGANIZATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY	
4.1	Formal Signing of Assessment Findings	31
	APPENDICES	
1.	Glossary	32-33



MSPO ASSESSMENT REPORT - PART 4

FIGURE

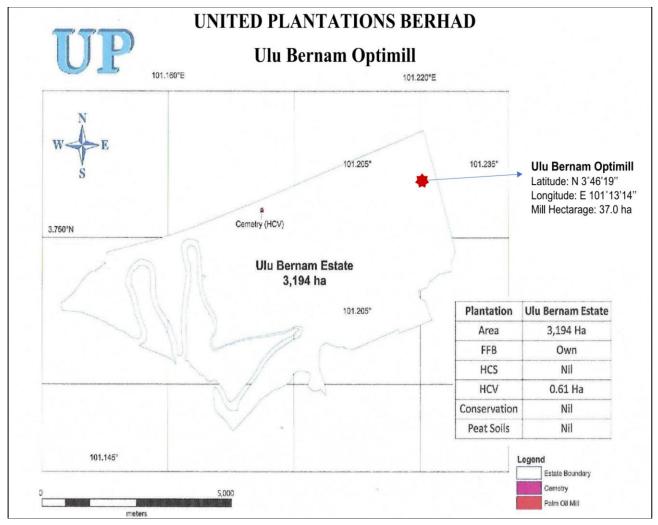
Figure 1. Location Map of United Plantation's plantations and palm oil mills



mutu certification international

MUTUAGUNG LESTARI MALAYSIA SDN BHD

Figure 2. Location Map of Ulu Bernam Optimill within Ulu Bernam Estate



1.0	SCOPE OF THE CERTIFICATION ASSESSMENT	
1.1	Assessment Standard Used	Malaysian Sustainable Palm Oil (MSPO)- MS 2530-4:2013: Part 4: General principles for Palm Oil Mills
1.2	Organization Information	
1.2.1	Company name	United Plantations Berhad
1.2.2	Contact person	C. Mathews
1.2.3	Company address and site address	Organisation address: Jendarata Estate 36009 Teluk Intan, Perak Darul Ridzuan, Malaysia
		Site address: Jendarata, 36009 Teluk Intan, Perak Darul Ridzuan, Malaysia
1.2.4	Telephone	+605-6411411
1.2.5	Fax	+6605-6416220



1.2.6	E-mail	E-mail				cmm@u	nitedplantation	ns.com		
1.2.7	Web page ad	Web page address				www.uni	tedplantations	.com		
1.3	Mill Informa	Mill Information								
1.3.1	Location of N	Location of Mill								
	Name o	Name of Mill Location				Coordinate				
			Ha Divan D		25000	Latitude		<u>L</u>	Longitude	
	Ulu Bernam	Optimill		er Business Unit, 35800 ver, Perak, Malaysia N 3° 46' 19"		E 1	E 101° 13' 14"			
1.3.2	Forecasted and actual volume of FFB, CPO and PK									
	Projected	Projected Volume - past year			ctual volumes	,	Projected volume		ne	
	Sept 2016 to Oct 2017			July 2	July 2017 to June 2018		July 2018 to June 2019		2019	
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK	
	-	-	-	9,387.40	1,784.90	348.90	336,168	73,957	16,808	
	*Source 12 mon	th Forecasted C	PO/PK Product	ion Data by the Co	mpany. Use eithe	r 12 months for	ecast from audit o	r company's nex	t year's forecast.	
1.4	Other Certif	ications			T					
	ISO 9001:20	ISO 9001:2008 / 2015								
	ISO 14001: 2004 / 2015				-					
	OHSAS 1800	01:2007			-					
	ISCC				-					
	Others									

2.0	ASSESSMENT PROCESS
2.1	Certification Body
	Mutuagung Lestari Malaysia Sdn Bhd. B-0926 Empire Soho, Empire Shopping Gallery, Jalan SS 16/1 Subang Jaya, 47500 Petaling Jaya, Selangor, Malaysia Website: www.mutucertification.com Email: hari@mutucertification.com

mutu certification international

MUTUAGUNG LESTARI MALAYSIA SDN BHD

	Assessment Team
Main / ST-2	Mahaswaran Maliyapan (Lead Auditor) Malaysian. Executive Master in Entrepreneurship Enhancement [Supply Chain Management], Professional Diploma in International Management Practices, Graduate Diploma in Business Administration and Diploma in Mechanical Engineering. Has vast exposure and experience in engineering, quality, 2nd & 3rd party auditing in various industries and owns proven track records of auditing various multinational companies both locally and internationally. Certified Lead Auditor for ISO 9001, 14001, OHSAS 18001, RSPO P&C, RSPO SCCS, RSPO Next and MSPO. Since 2012 trained in agriculture certification programs such as RSPO, MSPO and SCCS and holds role as lead auditor or auditor with several local and overseas certification bodies. He too in Quality Environmental Management System as well the Occupational, Health and Safety auditing.
	Ebnu Holdoon Shawal (Auditor) Malaysian. Graduated with Bachelor of Civil Engineering from University Tenaga Nasional in Malaysia. He has been completed the ISO 9001: 2008 QMS Lead assessor course for RABQSA – QM 785 (Exemplar Global) certified. He has an experience regarding the safety, health and environmental standard for construction works as an engineer for 1 year. He has gone for various RSPO audit including Felda POM and United Plantation as trainee auditor and have total 42-man days following the auditing activities. During this audit he has been assigned to verify the Transparencies and Environmental aspect.
	Khairul Anuar bin Abdul Hamid (Auditor) Malaysian. Khairul Anuar is a graduate from University of Alabama at Birmingham with Bachelor of Science in Civil Engineering (environmental) and holds a degree of Associate in Applied Science from the University of New York at Buffalo. A registered Environmental Auditor (EA0079) with the Department of Environment Malaysia. A Certified Erosion Sediment and Storm Water Inspector (CESSWI3309) and also the first batch holder for competency in Environmental Compliance Audit Training from the Natural Resources and Environment Board (NREB) Sarawak. He is also trained in ISO14001 EMS Lead Auditor. 24 years of working experience in various industries and disciplines including a 5 years Lead Estimator role at Honeywell (A Fortune 100 company
2.3	Assessment Methodology, Assessment Process, and Locations of Assessment
2.3.1 Main /	Figure of person days to implement assessment Number of auditors: 3 auditors
ST-2	Number of days for Main/Stage-2 at site: 1 day Number of working days for Main/Stage-2 at site: 3 Working days
2.3.2	Detail process ofassessment
Main /	Detail process orassessment
ST-2	Mutuagung Lestari Malaysia Sdn. Bhd. [thereafter known as MUTU] has conducted on-site Certification Assessment for Ulu Bernam Optimill on 9th July 2018 by 3 auditors as to assess the compliance of the certification unit against the MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. The Stage 1 audit not applicable as the client already certified for RSPO and other sustainability programs.
	for Ulu Bernam Optimill on 9th July 2018 by 3 auditors as to assess the compliance of the certification unit against the MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. The Stage 1
	for Ulu Bernam Optimill on 9th July 2018 by 3 auditors as to assess the compliance of the certification unit against the MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. The Stage 1 audit not applicable as the client already certified for RSPO and other sustainability programs. This stage 2 assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results delivered by the MUTU auditor to the management unit and the
	for Ulu Bernam Optimill on 9th July 2018 by 3 auditors as to assess the compliance of the certification unit against the MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. The Stage 1 audit not applicable as the client already certified for RSPO and other sustainability programs. This stage 2 assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase. All information obtained was recorded in Check List of MUTU. It was witnessed, the Ulu Bernam Optimill was having partial production as they were not receiving enough crop to start the process during the scheduled time of for the POM visit. However, the audit team started the site visit from the input receiving and then walk through the production process which eliminates the risk of missing
ST-2	for Ulu Bernam Optimill on 9th July 2018 by 3 auditors as to assess the compliance of the certification unit against the MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. The Stage 1 audit not applicable as the client already certified for RSPO and other sustainability programs. This stage 2 assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase. All information obtained was recorded in Check List of MUTU. It was witnessed, the Ulu Bernam Optimill was having partial production as they were not receiving enough crop to start the process during the scheduled time of for the POM visit. However, the audit team started the site visit from the input receiving and then walk through the production process which eliminates the risk of missing certain key aspects. The assessment program please find Appendix 2
	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. The Stage 1 audit not applicable as the client already certified for RSPO and other sustainability programs. This stage 2 assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase. All information obtained was recorded in Check List of MUTU. It was witnessed, the Ulu Bernam Optimill was having partial production as they were not receiving enough crop to start the process during the scheduled time of for the POM visit. However, the audit team started the site visit from the input receiving and then walk through the production process which eliminates the risk of missing certain key aspects.

mutu certification international

MUTUAGUNG LESTARI MALAYSIA SDN BHD

MSPO ASSESSMENT REPORT - PART 4

2.4	Stakeholder Consultation					
2.4.1	Summary of stakeholder consultation process					
MAIN / ST-2	 Consultation of stakeholders for Ulu Bernam Optimill – United Plantations Berhad was held by: Public announcement at web www.mutucertification.com on 31st May 2018. Public consultation by interview with Gender Committee, contractor, labor union, Shop owner, and worker's representative on July 3rd, 2018. Consultation with NGO (Suhakam-National Human Rights Society, NUPW –National Union of Plantation Worker, Traffic - the wildlife trade monitoring network, & Malaysian Environmental NGOs – MENGO). Numbers of input from stakeholders were clarified by Ulu Bernam Optimill – United Plantations Berhad. 					
2.5	Determining Next Assessment					
	The next visit of ASA 1 will be determined one year after this Main / ST-2.					

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the MSPO Certification

MUTU has conducted the main / ST-2 assessment of Ulu Bernam Optimill – United Plantations Bhd operation consisting of one (1) mill. During this assessment, there was zero (0) non-conformities, two (2) opportunities for improvement were identified against MS 2530-4:2013. Further explanation of the non-conformities raised are provided in section 3.5.

MUTU found that Ulu Bernam Optimill satisfactorily complied with the requirements of MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills. Since the audit objectives as mentioned in the audit plan have been achieved and assessment that was resulted with no major non-conformity, therefore the lead auditor **recommends** Ulu Bernam Optimill for compliance with the MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mills.

Ref Std.	VERIFICATION RESULT of MUTU-Certification						
4.1 PRINCIPL	4.1 PRINCIPLE 1 MANAGEMENT COMMITMENT AND RESPONSIBILITY						
4.1.1 Malaysia	nn sustainable palm oil (MSPO) policy						
4.1.1.1 Indicat	or 1: A policy for the implementation of MSPO shall be established.						
Berhad. Sighte various Group & Contract Sub on Group Sust	A corporate MSPO Policy seen dated on 29/03/18 was approved Dato' carl Bek-Nielsen, the CEO of United Plantations Berhad. Sighted the policy has been translated into Bahasa Malaysia, Tamil, Bengali and Hindi. This policy is linked to various Group Sustainability Policies such as commitment towards No Child Labour, No Deforestation, No Forced Labour & Contract Substitution, Meeting the Minimum Wages Standard, etc. The mill workers and staff are being regularly briefed on Group Sustainability Policies during toolbox meeting, sampled training record for store workers on "Code of Conduct and Business Ethics" dated for 26/06/18 for shift B operators on 17/06/18 and shift A operators on 03/06/18.						
	Status:	Ok					
4.1.1.2 Indicat	or 2: The policy shall also emphasize on the commitment to continual improvement with t	he objective of					
improving the i	milling operation.						
Group Sustainability Policies sampled for legal compliance requirements that cross verified with objective, target plan and CIP such as comply with applicable laws, maintain an open and dynamic approach towards CIP, establish traceability within the supply chain and etc.							
	Status:	Ok					



MSPO ASSESSMENT REPORT - PART 4

4.1.2 Criterion 2: Internal audit:

4.1.2.1 Indicator 1: Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.

There is annual "Sustainability" Internal Audit by the HRESH [Human Resource, Environment, Safety and Health] and latest audit was done on 24/05/18. The assessment was conducted by Jeevan, Lee and Ramesh which resulted with 23 non-conformities. Seen the assessment covers requirements needed by the sustainability scheme and mill best practices. Among the lapses found were employees handbook to be updated with revised policies, list of ERT members and fire extinguishers not updated, insufficient safety signages, improper management of schedule waste and etc.

Status: Ok

4.1.2.2 Indicator 2: The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.

Internal audit procedure dated on 27/02/18 is adequately identifies the process flow of the annual exercise is from establishing audit schedule \rightarrow audit team selection \rightarrow prepare audit plan \rightarrow conduct audit – reporting of findings. Any non-conformities found during internal audit, shall be issued with a summary of findings and HRESH team to follow-up on the corrective actions.

Status: Ok

4.1.2.3 Indicator 3: Report shall be made available to the management for their review.

The findings from internal audit was responded by the mill management. Since the management review for 2018 is planning to be in 3rd quarter, therefore the findings from internal audit will be discuss accordingly. It will be review by auditor in next assessment. The internal audit findings seen effectively addressed of the root causes with corrective actions plan in the NCR finding matrix.

Status: Ok

4.1.3 Criterion 3: Management review

4.1.3.1 Indicator 1: The management shall periodically review the continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.

Management review meeting for the period 01/01 – 31/12/2017] was done on 03/05/18 attended by operation & office staff and the mill Resident Engineer chaired the meeting. The meeting initially scheduled on Jan 2018 was delayed due to mill commissioning works that also associated with legal compliance monitoring from DOE and DOSH. Sighted the management review effectively covers internal audit findings, objectives & targets, reviewed of QMS, EMS & OSH policies, budget management, stakeholder communication, resource management customer satisfaction and production process.

Status: Ok

4.1.4 Criterion 4: Continual improvement

4.1.4.1 Indicator 1: The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.

The CIPs are divided into 5 main pillars as supply chain, waste management, pollution prevention or reduction, OSH and social impacts. Sampled, as at 01/07/18, there are 3 CIPs [supply chain] and 8 for waste management that available in the presentation form and some are on-going activities that brought forward from 2017 to 2018 with reason to maintain legal compliances of environment and safety. The CIP been associated with respective section's quality, environmental and OSH objectives. Sampled, the domestic water usage decreased due to fixing of faulty meters and replacement of old corroded pipes. The action plans are to periodically checking on meters and/and leaking pipes and to educate the employees on the wastage of water or penalize them. As for diesel usage, the mill management is close monitoring on vehicle usage & expected improvement from TNB for consistent supply which will avoid using genset.

Status: Ok

4.1.4.2 Indicator 2: The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.

During mill visit seen the double layer Vorsep Dust Collector System which was commissioned at cost of RM 1 million to meet the DOE's Clean Air Regulation that to be below 150mg/m³ from the current standard of 400mg/m³. With this improvement, the current stack sampling conducted in June 2018 recorded at below 110mg/m³. This is a brand new mill with semi automation that reduces manpower mobilization and FFB handling from receiving station to loading ramp.



4.2.2

MSPO ASSESSMENT REPORT - PART 4

Status: Ok

4.2 PRINCIPAL 2: TRANSPARENCY

4.2.1 Criterion 1: Transparency of information and documents relevant to MSPO requirements

4.2.1.1 Indicator 1: The management shall communicate adequate information to other stakeholders on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.

The latest stakeholder list was reviewed and updated on 16/04/18. Sighted the evidences of the stakeholder meeting which was done on 05/07/18, sighted the attendance record [total 18 attended], the draft of minutes of meeting was briefed by the Resident Engineer. The session was done through an questionnaire method that divided into workers, environment, community and product marketing Based on the log book for communication and respond, appears no external stakeholder's remarks and for workers seen complaints on house maintenance.

Status: Ok

4.2.1.2 Indicator 2: Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

The information on the publicly available documents seen specifically addressed in company webpage and annual financial report. This information also been communicated to external stakeholder during annual meeting on 05/07/18. During this audit process, various stakeholders were interviewed and they revealed of their understanding on the publicly available documents.

Status: Ok

Criterion 2: Transparent method of communication and consultation

4.2.2.1 Indicator 1: Procedures shall be established for consultation and communication with the relevant stakeholders.

There is a Grievance Redressal Procedure in the Annual Financial Report for 2017 and in MSPO folder. This SOP serves as part of communication and consultation in clearing up misunderstanding / conflict / grievances or raising any issues with United Plantations Berhad. This SOP is adopted, in an effective, timely and appropriate manner that is open and transparent to any affected parties. The procedure stated that all grievances are formally recorded at point of receipt and settled as soon as possible but not more than 30 days and grievances acknowledged by letter within 7 workings days to stakeholder and mill Resident Engineer / head of department from the company secretary.

Status: Ok

4.2.2.2 Indicator 2: The management shall nominate management officials at the operating unit responsible for issues related to Indicator 1 (4.2.2.1).

Sighted a letter dated on 29/03/18 from the company CEO who has appointed the mill Resident Engineer Mr. Saravanaganes as window person to communicate and follow up with regards to stakeholder's issues.

Status: Ok

4.2.2.3 Indicator 3: A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.

The latest reviewed of immediate stakeholder list dated on 16/04/18 seen consists of government agencies and other interested parties. The meeting minutes with stakeholder are effectively documented. The complaints and feedbacks during stakeholder meeting was responded by mill through a management plan.

Status: Ok

4.2.3 Criterion 3: Traceability

4.2.3.1 Indicator 1: The management shall commit itself to implement and maintain the requirements for traceability and shall establish a standard operation procedure for traceability.

The mill is necessary to verify the volumes and source of FFB entering the mill and to keep track of the FFB production throughout the mill processing. The mill has implemented SOP for Traceability [SOP on Traceability] Doc No: MSPO Indicator 4.2.3, dated 17/04/18 and SOP on Sustainable Supply Chain and Traceability RSPO SCC dated 08/03/18 as to provide guideline to establish sustainable supply chain and traceability for FFB. Sampled verified of chits from Jan, Feb, Apr and Jun 2018 with no negative findings. Mill has appointment letter for personals delicate on monitoring traceability.



MSPO ASSESSMENT REPORT - PART 4

4.2.3.2 Indicator 2: The management shall conduct regular inspections on compliance with the established traceability system.

Internal audit by the HRESH team found includes the traceability processes that covering the 4 indicators in the criterion 3, assessment is conducted on annual basis. During mill visit, sighted the weighbridge operator able to demonstrate on how the system tracks the FFB input and how does the supply bases register in "Approved Sustainable Supplier List".

Status:

4.2.3.3 Indicator 3: The management shall identify and assign suitable employees to implement and maintain the traceability system.

The person in-charge is the assistant manager, verified "Job Scope" that stated his role on implement and maintain traceability system. The records for traceability [RSPO & SCC training] on various dates to the respective supporting personnel seen maintained.

Status: Ok

4.2.3.4 Indicator 4: Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.

Sampled weighbridge tickets [Jan - May'18] were cross-checked for the delivery of non-certified CPO against the shipping instruction from logistic department. The daily production record [throughput] were reviewed to cross-check against the daily ullage measurement taken every morning. The amount of FFB processed was cross-checked against the amount received. Example, weighbridge tickets include contract number. CPO delivery order weighbridge tickets include contract number.

Status: Ok

4.3 PRINCIPLE 3: COMPLIANCE TO LEGAL REQUIREMENTS

4.3.1 Criterion 1: Regulatory requirements

4.3.1.1 Indicator 1: All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.

Below permits and licenses were verified for compliance:

- MPOB license for FFB, PK, CPO, SPO from until 30/11/18, (license number 617006004000).
- DOE License 004261 initially dated on 01/12/17. The license renewed on 30/06/19 for period 2018/19
- Cage weighter [weighbridge] during incoming #171450817 5000kg
- Permit for Back Pressure Vessel PK PMT 80901 valid till 08/07/19.
- Permit for water supply for domestic use SPAN/EKS (PT)800-4(1)/15/09 for Ulu Bernam Estate.
- Fire extinguisher permit monitoring 25 units [2 CO₂ and 23 ABC] expiring the earliest on 16/08/18.
- Diesel permit A037533 for 20,700 liter expires on 25/01/19.
- License for Sodium Hydroxide #00156 to purchase maximum solid=0 and liquid 10,000.
- Permit for Natrium Hydroxide valid till 31/12/18 to purchase maximum solid=0 and liquid 10,000.
- License to operate private hospital as required by Akta Kemudahan dan Perkhidmatan Jagaan Kesihatan Swasta 1998 – 130807-00306-01/2016 – valid 23/02/20
- The mill management has initiated the Fire Certificate application [Fire Services Act 1988 and Fire Services (Fire Certificate) Regulations 2001. Sighted a letter from the Majlis Perbandaran Teluk Intan dated 08/03/17 reference to process 3 Notifikasi (Permulaan Kerja Binaan).
- 1st Schedule from Jabatan Perancangan Bandar dan Desa, Perak" # C1:KM/A9/0181 dated 09/07/15 allowing United Plantations Berhad to build a palm oil mill on land carries the title No. 145238 Lot 10100.
- Certified Environmental Professional in Waste Management (CEPSWAM) Nik Jazrikel bin Johannis CePSWaM/01295.
- Certified Environmental professional in the Treatment of Palm Oil Mill Effluent Pond Processes (CePPOME)
 No. CePPOME/15133 Nathan Raman.
- CEMS monitoring is in progress of installation by contractor and was communicated to DOE on the progress.
- Quarterly Return Form as per First Schedule of the EQ (Prescribed Premises) (Crude Palm-Oil) Regulations, 1977 – was not able report to DOE for 1st Quarter 2018 as the mill was not having continuous operation and therefore the DOE system was not able to receive the insufficient inputs. As for the 2nd quarter, the mill will be submitting by 15/07/18.
- Sampled Steam Engineer Gred 1 Saravanaganes [072/2016]



MSPO ASSESSMENT REPORT - PART 4

- Engine Driver Kathirasan Munusamy [PK 4/2005]
- Charge man Murugan Muniandy [PJ-T-4-B-0648-2015]
- Authorized Entrant and Standby Person for Confined Space [Manimaran NW-HQ-AE-6262-L]
- Based on Initial Noise Exposure Monitoring result [HQ/14/PEB/00/134-2017/043 by CSK Murni Services] dated 26/12/17 – high noise area 90 - 96db(A) are engine room, boiler and kernel plant. Whereby the sterilizer and oil room recorded between 85.0 – 90db(A).
- Annual & Baseline Audiometric Testing done Earwright Services & Consultants Nov. 2017 as per required by the Noise Regulation for Workplace 1989, total 119 employees were tested [and no employee was found to have hearing impairment at different levels.
- Isokinetic stack, Air Emission and Dark Smoke [report No. MURNI/0118/3066] done on 11/01/18 and reported on 23/01/18. Result for boiler 2 tested parameters were below than required by Clean Air Regulation 2014.

Status: Obs

4.3.1.2 Indicator 2: The management shall list all relevant laws related to their operations in a legal requirement register.

The mill annually checks the adequacy of legal compliances and they receive updated legal requirement notifications from Group HR Manager. There are 43 law books available as for reference and cross verified against annual legal compliance monitoring list. Among the legal list maintained are Anti-Corruption Act 1997, Employees Provident Fund Act 1991, Water Act 1920 and etc. Sampled legal requirement register for Schedule Waste Regulation 2005.

Status: Ok

4.3.1.3 Indicator 3: The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.

The Group Manager Human Resources and Environment, Safety and Health manage the set of legal documents and communicate to the mill Resident Engineer. There were no significant changes addressed in the regulation of OHS and environment. As for the general category, "Laws of Malaysian Act 803, Anti Fake News Act 2018 has been updated and communicated of the changes within all operating units. Personnel in charge on tracking and updating applicable legal documents are stated in the sustainability manual and mill have list of licence and permit includes the expired date and person responsible as system to tracking all permit is up to date.

Status: Ok

4.3.1.4 Indicator 4: The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.

Any changes in the applicable laws and regulations, the Group Manager Human Resources and OHS and Environment, Mr. Mathews co-ordinates with respective operating units. SOP for legal requirement stated a periodic review and evaluation on the laws & regulations list carried out to ensure that any new/addition as well as changes and amendment are captured and update, through enquiring the laws books publisher and/or communication with law/enforcement officers. There were 7 in 2016, 11 in 2017 and 7 in 2018 notifications of changes been circulated and the changes effectively received and acknowledged by mill Resident Engineer.

Status: Ok

4.3.2 Criterion 2: Land use rights

4.3.2.1 Indicator 1: The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.

The mill is located in Ulu Bernam Estate – Division 02 [37.0 ha]. Verified the land title that able to correspond to DOE's Jadual Pematuhan.

Status: Ok

4.3.2.2 Indicator 2: The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.

The mill is located in Ulu Bernam Estate – Division 02 [37.0 ha]. Verified the land title that able to correspond to DOE's Jadual Pematuhan.



ground, where practicable.						
The mill perimeter found fenced from illegal entrance by outsiders. The mill has no plan of extension of operational area.						
Status:	Ok					
4.3.2.4 Indicator 4: Where there are, or have been disputes, documented proof of legal acquisition of l						
fair compensation that have been or are being made to previous owners and occupants; shall be made						
that these should have been accepted with free prior informed consent (FPIC).						
There are no communities nor individual has any implications for the legal status of their land.						
Status:	Ok					
4.3.3 Criterion 3: Customary land rights						
4.3.3.1 Indicator 1: Where lands are encumbered by customary rights, the company shall demonstrate	e that these					
rights are understood and are not being threatened or reduced.						
There are no communities nor individual has any implications for the legal status of their land.						
Status:	NA					
4.3.3.2 Indicator 2: Maps of an appropriate scale showing extent of recognized customary rights shall	be made					
available.						
There was no traces of communities nor individual implications for the legal status of their land or have						
Status:	NA					
4.3.3.3 Indicator 3: Negotiation and FPIC shall be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements should be recorded and copies of the relevant agreements agreement agree	ould be made					
available.						
No negotiation process involved.	NA.					
Status:	NA					
I A A DDINICIDI E A: SOCIAL DESDONISIBILITY HEALTH SAFETY AND EMDLOYMENT CONDITION						
4.4 PRINCIPLE 4: SOCIAL RESPONSIBILITY, HEALTH, SAFETY AND EMPLOYMENT CONDITION 4.4 1 Criterion 1: Social impact assessment (SIA)						
4.4.1 Criterion 1: Social impact assessment (SIA)						
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg 						
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. 	gative impacts and					
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low an experience of the promote that the positive ones. 	gative impacts and and negligible. The					
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium risk 	gative impacts and and negligible. The isk at quarterly and					
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinnegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound. 	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rin negligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc.	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads ver rate, prohibition					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinnegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status:	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinnegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads ver rate, prohibition Ok					
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinnegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do 	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads wer rate, prohibition Ok ocumented.					
 4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnow of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version 	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads yer rate, prohibition Ok cumented.					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rin negligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engagement.	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads wer rate, prohibition Ok cumented. n of complaints and ent process and a					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnou of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engagement framework for internal and external stakeholders to understand the applicable process for raising any	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads wer rate, prohibition Ok cumented. n of complaints and ent process and a					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rin negligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engagement.	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads wer rate, prohibition Ok cumented. n of complaints and ent process and a					
4.4.1 Indicator 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnou of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engageme framework for internal and external stakeholders to understand the applicable process for raising any Plantations Berhad.	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads were rate, prohibition Ok cumented. n of complaints and ent process and a issues with United					
4.4.1 Criterion 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the negoromote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnov of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engageme framework for internal and external stakeholders to understand the applicable process for raising any Plantations Berhad. Status:	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads were rate, prohibition Ok cumented. n of complaints and ent process and a issues with United					
4.4.1 Indicator 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rin negligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnous of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engageme framework for internal and external stakeholders to understand the applicable process for raising any Plantations Berhad. Status: 4.4.2.2 Indicator 2: The system shall be able to resolve disputes in an effective, timely and appropri accepted by all parties. Sighted the grievance redressal procedure in page 144 explained in a flow chart, such as if any matter.	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads were rate, prohibition Ok cumented. n of complaints and ent process and a issues with United Ok tate manner that is unsettled within 30					
4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rinegligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnou of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engageme framework for internal and external stakeholders to understand the applicable process for raising any Plantations Berhad. Status: 4.4.2.2 Indicator 2: The system shall be able to resolve disputes in an effective, timely and appropriaccepted by all parties. Sighted the grievance redressal procedure in page 144 explained in a flow chart, such as if any matter days [extremal stakeholder] and 7 days [internal stakeholder] or without any mutual satisfaction, their	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads wer rate, prohibition Ok cumented. n of complaints and ent process and a issues with United Ok iate manner that is unsettled within 30 n it be dealt under					
4.4.1 Indicator 1: Social impact assessment (SIA) 4.4.1.1 Indicator 1: Social impacts should be identified and plans are implemented to mitigate the neg promote the positive ones. Based on the internal stakeholder's social risk assessment review plan, the risk identified were low a social impacts outputs which rated as critical to be review on weekly, high cases on monthly, medium rin negligible on annual basis. The mill has done a group level review on 09/07/18. Among the key issues or regular inspection to arrest spillage of lauric oil and floor washing, conflict with stakeholders over bound for surrounding communities passing the mill's road, work condition of foreign workers and their turnous of child labor and discrimination, human rights policies, basic human ethics, basic amenities and etc. Status: 4.4.2 Criterion 2: Complaints and grievances 4.4.2.1 Indicator 1: A system for dealing with complaints and grievances shall be established and do The Annual Report 2017 of United Plantations Berhad [which publicly available] consist of latest version grievances procedures in page 143. The procedure meant for continuous stakeholder engageme framework for internal and external stakeholders to understand the applicable process for raising any Plantations Berhad. Status: 4.4.2.2 Indicator 2: The system shall be able to resolve disputes in an effective, timely and appropri accepted by all parties. Sighted the grievance redressal procedure in page 144 explained in a flow chart, such as if any matter.	gative impacts and and negligible. The isk at quarterly and discussed were on dary, access roads wer rate, prohibition Ok cumented. n of complaints and ent process and a issues with United Ok iate manner that is unsettled within 30 n it be dealt under					



MSPO ASSESSMENT REPORT - PART 4

4.4.2.3 Indicator 3: A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints

Seen there is a complaint box affixed at entrance to the office. There are empty forms attached to the box. The admin staff will collect any filled forms on daily basis.

Status: Ok

4.4.2.4 Indicator 4: Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.

Confirmed during the interview with workers and stakeholders that they have been aware and understand regarding to the complaint and grievance mechanism, including the personal in charge to handle the complaint and timeframe for responding. During the external stakeholder meeting, sufficient briefing on complaint flow made. This was verified during stakeholder consultation on 11/07/18, whereby all the attended stakeholders agree the company provides information.

Status: Ok

4.4.2.5 Indicator 5: Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.

Seen the internal and external complaint & grievances log book and as at audit period, there was no negative complaints made by either party in the last 24 months. Its more to request and response from them for household maintenance which the estate management responded timely.

Status: Ok

4.4.3 Criterion 3: Commitment to contribute to local sustainable development

4.4.3.1 Indicator 1: Palm oil millers should contribute to local development in consultation with the local communities. Where the mill is an integral part of a plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.

The mill providing free ferry services [which connecting Ulu Bernam estate with neighboring towns such as Sg. Besar, Sabak Bernam and Teluk Intan] to its employees, their family members as well the surrounding communities. Aside the mill management with effort from Ulu Bernam Estate has provided land and fund for Hindu temple operation and sometimes support in certain festivals organized by the temple committee.

Status: Ok

4.4 PRINCIPLE 4: SOCIAL RESPONSIBILITY, HEALTH, SAFETY AND EMPLOYMENT CONDITION

4.4.4 Criterion 4: Employees safety and health

4.4.4.1 Indicator 1: An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act139) shall be documented, effectively communicated and implemented.

OSH Policy has been developed generally for the whole UP group comprising of Mills and Estates. Latest Policy was endorsed by the CEO Dato' Carl Bek-Nielson on 18/8/17. The policy was communicated via series of programmes such as OSH Plan, OSH Manual, circular on safety – tracking system in changes of laws. Managed by HR, Environment, Safety & Health Department. Latest Circular was on Guidelines for Manual Handling at Workplace, 8/6/18. Sighted OSH Committee Meetings – latest organization chart reviewed in 2018. Verified the OSH training – OSH Training programme for 2018. Latest training conducted on 9/6/2018 on Biogas station. There is a good management system formulated on OSH.

- **4.4.4.2 Indicator 2:** The occupational safety and health plan shall cover the following:
 - a) A safety and health policy, which is communicated and implemented.
 - b) The risks of all operations shall be assessed and documented.
 - c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:
 - i) all employees involved are adequately trained on safe working practices; and
 - ii) all precautions attached to products should be properly observed and applied.



MSPO ASSESSMENT REPORT - PART 4

- d) The management shall provide the appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).
- e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.
- f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.
- g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meetings shall be kept and the concerns of the employees and any remedial actions taken shall be recorded.
- h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.
- i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.
- j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals

A safety and health policy, which is communicated and implemented. The amended Occupational, Safety, Health and Environment Policy sighted - Signed by the Chief Executive Officer of United Plantation Berhad. Hazard Identification and Risk Control (HIRARC) & Safe Operating Procedure (SOP)containing list of 42 SOPs where (i) set standard in developing HIRARC & SOP (ii) Identify all hazards and aspects in workplace (iii) assess risk of respective hazards/aspects and formulate control measure to mitigate them (iv) set objective, target, ESH program and generating safe work place.

All employees involved are adequately trained on safe working practices; and training plan matrix for 2018 sighted. Training example training for SOP and HIRARC Boiler Operations dated 10th May 2018 (Attendee Manimaran, Ashraff dan Hasifuddin – Boiler & Firemen and training on confined space procedures, on 8th June 2018, Total of 15 participants. MSDS for all related products available. And sighted appropriate personal protective equipment found at workplace sampled to cover all potentially hazardous operations.

PPE record book sighted for shift A & B also PPE stock in the Optimill computerized stocking system was sighted. Also sighted the Bin Card for PPE Stock (Helmet, Ear Plug, Leather Glove, Mask, Cotton Glove). All SOPs listed (RSPO 4.7.2 and 4.7.3) SOP for No.21 SOP at Lab Ops and its HIRARC, No. 34 SOP for Store Operation (Petrol/Diesel Dispatches) and its HIRARC. Appointment letter for OSH Member sighted, sampled the appointment of Mr. Kazi Jahid (Bangladesh Rep) UBED as new member of OSHA Committee dated 30 Jan 2018.

OSHA Committee at Optimill Chairman – Mr. P. Seker, VC 1 – Mr. N Saravanaganes, VC 2 - Mr. Nathan/ Mr. Nik Jazrikel, Group Safety Officer – Mr. S Ramesh, Management Rep – 8 persons, Workers Rep – 11. Minutes of Meeting for OSHA safety Meeting dated 14th March 2018 and 2nd July 2018 were sighted. Meetings are held on quarterly basis. Emergency Shower/Eye Wash was sighted and tested at the Laboratory. First Aid Kit sighted at weighing bridge and mill to be in good condition. First Aid Box replenishment Internal Memo sighted. Dated 8th May 2018 to replenish items in UBED FAKs. A sample of the accident record was an incident on a general worker named Ajith Kumar Jayabal (Passport P8767376) on 17/04/2018 at 11:40am got hit with the heat from the engine room. The accident was reported to JKKP Perak and the workers was on medical leave for two weeks.

Status: Ok

4.4.5 Criterion 5: Employment conditions

4.4.5.1 Indicator 1: The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.

There is a Human Rights Policy established for UP group endorsed on 18/8/2017. Bullet points number 9 mentioned that child workers are prohibit to be employed. Child workers mean anyone who is less than 18 years old. The mill has kept the record of all their workers and complied accordingly.



MSPO ASSESSMENT REPORT - PART 4

4.4.5.2 Indicator 2: The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.

The mill did not practice discriminatory and provide equal opportunity to all races, color, sex and political opinion. There was workers record showed the above was complied. Sighted also the social policy of the company that the company will committed to adhering to the principles as "All employees should be treated fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion, or age.

Status: Ok

4.4.5.3 Indicator 3: Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage

Employee's payment record showed that the Mill adhere to the Malaysian Minimum wages scheme of RM 1,000 per month. Payment record showed in check roll summary were all above RM 1000.00 per month. 2 types of worker, there are C-roll and Contractor workers. Based on MAPA circular no 14/2016 on 5 may 2016 about minimum wages order 2016 known that minimum wages in peninsular Malaysia are RM 1000. This circular effective on 1 July 2016. Documentations on pay conditions made available as per contract made by the workers and management.

Status: Ok

4.4.5.4 Indicator 4: Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.

Based on the external stakeholder interview with contractors, the mill management is always supportive and concern over the beneficiaries of contractor's workers that including of ensuring minimum wages paid accordingly.

Status: Ok

4.4.5.5 Indicator 5: The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.

Check roll summary on June 2018 has observed detail of worker's income inclusive of overtime and holiday pay. Sighted a master list been divided into description of sex, date of birth, employee full name, the date of joining the company, and work designation description verified.

Status: Ok

4.4.5.6 Indicator 6: All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.

UPB Guest Workers Policy ensures that no forms of forced labour or trafficked labour are used, no difference is made between foreign and local workers, all foreign workers are in possession of a valid work permit in accordance with Malaysian Immigration Regulation, all foreign and local workers are covered under the purview of "Workers' Minimum Standard of Housing and Amenities Act 1990 and etc.

As for foreign workers, sampled payment slip for June 2018 of Udai Singh Mahara (No. Gaji 20404), the net pay he received was RM 1,985.92 after deductions. As for local worker, sampled payment slip for June 2018 for Raju Narasilmulu (No. 10005), who received a net pay of RM 1,322.77. sampled the Memorandum of Agreement for Employment, a contract on the 4th April 2018 between UPB and Nagananthini A/P Subramaniam (MRIC 950311-10-6064) signed by both parties.

Status: Ok

4.4.5.7 Indicator 7: The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.

Time recording system was implemented via Daily Rated Workers Input Form for every individual. It is transparent for both employee and employer.



MSPO ASSESSMENT REPORT - PART 4

4.4.5.8 Indicator 8: The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirement applicable.

Daily Rated Workers Input Form has shown the details of the working hours and over time. Based on the contract agreement made by the company and workers, stated that "you may work overtime and this is subject to approval from your manager. Overtime means any work performed after your normal working hours. You will be paid overtime based on applicable rates in the employment Act 1955(EA). Sighted the contract agreement had been signed by the workers and management (mill manager and, passport number and date of agreement made.

Status: Ok

4.4.5.9 Indicator 9: Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.

Workers salary and overtime payment were following the regulations and agreement. The check roll summary record tabulated the details. As per MAPA/NUPW Filed and Other General Employees and Fringe Benefits, agreement 2003, sighted also the clause calculation of annual leave pay in Lieu (Article 20- annual leave) stated that "such payment will be made during the first week in January of the following year".

Status: Ok

4.4.5.10 Indicator 10: Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings

Beside free accommodation and other amenities. Workers were being paid Vacation Leave Pay (VLP) provided they adhere to less than 10% absent record. Based on document review and field observation, the company has provided amenities (facilities) for workers such as workers housing area, shop houses, kindergarten, mosque and etc. The company has provided electricity and water supply with limits 50 gallons a day for each worker. The electricity has been subsidies by employer with RM 6.54.

Status: Ok

4.4.5.11 Indicator 11: In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.

Following field visits to the field and worker' living quarters, workers were provided with good quarters and amenities. The management have complied workers Minimum Standards of Housing and Amenities Act 1990 (Act 446). There is available document in form of internal memorandum date on 11-05-2016 from assistant manager to Field manager regarding the guest working housing – spot check. The internal memorandum tell that will be housing check on 100-unit housing, new housing quarters, semi-D, Desa Permai. The workers had been providing the proper and adequate housing facilities for Ulu Bernam Optimill (new complexes housing – 64 houses (staff and workers 3d blocks unit) at Division 2 Ulu Bernam Estate, adequate electricity (Subsidy). School and facilities (mosque, hospital, football field, shops and groceries, temple) will be located at Ulu Bernam Optimill. Free clean drinking water [with limits 50 gallons a day for each worker] supplied by the Ulu Bernam water treatment plant for domestic usage. The company also provide the school bus for the children to school.

Status: Ok

4.4.5.12 Indicator 12: The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.

The company had produced a policy dated on 24/04/15 related to Gender Policy stated that the company shall comply: "endeavor to prevent sexual harassment and all other forms of violence against women, workers and community" and "establish a specific complaints and grievance procedure and mechanism, acceptable by all parties, to address gender based issues" by establishing the gender committee to implement and monitor the policy. The company had displayed the policy on the notice board and muster ground roll call. Based on the gender meeting sighted no records of reporting related to sexual harassment in the workplace.



MSPO ASSESSMENT REPORT - PART 4

4.4.5.13 Indicator 13: The management shall respect the right of all employees to form and join trade union and allow workers own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.

Trade Union formed is NUPW. Record of employees joining NUPW was available. Evidence noted in NUPW Insurance Scheme.

Status: Ok

4.4.5.14 Indicator 14: Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.

Young person below 18 years will not be employed by UP. This is stated in employment policy and employment SOP. Workers age record showed that all workers are above 18 years old.

Status: Ok

4.4.6 Criterion 6: Training and competency

4.4.6.1 Indicator 1: All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.

Annual training programs for 2018 made by assistant manager and approved by estate manager. The training programs were made according to HIRARC requirements. Based on the annual training plan, it covers all operation section, particular attention to those areas with high impact on social, environment and OHS Optimill POM management unit has an annual training program for employees and contractor. For example, training subject program for Financial Year 2018 are training on first aid, fire fighting, environment health and safety (ESH), refreshment for all station, working at height, pump grease operational control, conveyor operational control, LOTO system etc. POM has also conducting training on Safety Town Hall for employees and contractor. Based on interview with Operators in Workshop, Water Treatment Plant, Chemical Storage and Lab, knowledge on OSH and Environment were adequate.

Status: Ok

4.4.6.2 Indicator 2: Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.

Training needs for employees were identified by Mill management true MSPO training needs analysis. The plan has been started in early quarter of 2018.

Status: Ok

4.4.6.3 Indicator 3: A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure

Continuous training programme was included in the MSPO Training Needs which was planned for 12 months.

Status: Ok

4.5 PRINCIPLE 5: ENVIRONMENT, NATURAL RESOURCES, BIODIVERSITY AND ECOSYSTEM SERVICES

4.5.1 Criterion 1: Environmental management plan

4.5.1.1 Indicator 1: An environmental policy and management plan which shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.

Sighted the environment and Biodiversity policy dated 18th August 2017 signed by Dato' Carl Bek Nielsen regarding United Plantations commitment through protection of the environment and conserving of Biodiversity. Based on the document, few objectives had been made such as conducting our operation under the best principles of agriculture that is compatible with the natural environment and full support of integrated pest management techniques and Best Management Practices for existing plantations on peat. Sighted the policy had been translated into Malay language, Bangladeshi, Indian and English Language to accommodate the workers that come from different nation into the mill. Based on mill visit, there were the policy being displayed in the general store room area, muster ground area in front of the mill office as the place are easily accessible by the workers.



MSPO ASSESSMENT REPORT - PART 4

- **4.5.1.2 Indicator 2:** The environmental management plan shall cover the following:
 - a) An environmental policy and objectives
 - b) The aspects and impacts analysis of all operations.

Environmental management plan and action plan has been developed by Optimill on waste management action plan 2018. Sighted the review plan on Environment Risk Assessment of all station. Sighted the meeting on environment Social risk / Impact Assessment had been done dated 10th March 2017 attended by 18 workers UBED Department, Chief clerk, Factory Supervisor, Weighbridge Supervisor, Maintenance Supervisor, Gender Committee, NUPQW, Indian Committee, Bangladeshi Committee, Nepali Committee, Indonesian Committee and Temple Committee). Sighted the action plan on environment for all the operation including items used, by whom, targeted date and resources. Based on the environment risk assessment (ERA) the environment impacts had been determined by Severity X Probability X Quantity (SQP) impacts the lead to the significance impacts of activity towards environment [low, Negligible, Severe].

Status: Ok

4.5.1.3 Indicator 3: An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.

Environmental Improvement plan had been developed into Environment action plan that categorized into method to reduce level of impact as followed, Operation of Boiler house \rightarrow to maintain dust collector cone and smoke density monitoring system, Installed Vorsep System to bide with Clean Air Regulation 2014, to implement proper disposal method, the boiler ash is sprayed with water before disposing. Sighted the Environment Action Plan had been made monitoring to promote positive one as per following plan: to maintain dust collector and smoke density monitoring system \rightarrow by whom Boiler man \rightarrow targeted date in practice. To implement Proper disposal method, e.g.: designated area \rightarrow by whom mill supervisor \rightarrow targeted date in practice \rightarrow used as road patching fields.

Status: Ok

4.5.1.4 Indicator 4: A programme to promote the positive impacts should be included in the continual improvement plan.

Programmed to promote positive impact had been recorded in continues improvement of the Ulu Bernam Optimill Mill. Sighted several improvements that had been done yearly and based on the monthly record of all operation in the mill. Sighted the management plant had been reviewed annually that will include the heads of estate, members- affected stakeholders and the minutes had been circulated to all the stakeholders, management unit of Optimill Mill.

Status: Ok

4.5.1.5 Indicator 5: An awareness and training programme shall be established and implemented to ensure that all employees understand the policy, objectives and management plans and are working towards achieving the objectives.

The mill had established a training program regarding the environment on MSPO aspect dated 26 June 2018 attended by 5 person regarding new policies of environment [policy dated 18th August 2017]. Based on the training evaluation formed that had been developed sighted the feedback form the attendees. There is specific training regarding MSPO criteria and awareness regarding the latest policy of environment on United Plantations dated 13th June 2018 attended by 22 workers form all the station including all the supervisor, operators from, sterilizer operator, bunch press, screw press, digester, kernel plant, Oil Station, FFB Loading, tippling, reception, Kernel plant, sterilizer and receptor.

Status: Ok

4.5.1.6 Indicator 6: Management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.

Sighted several meetings regarding the environment had been done accordingly involving local stakeholders which involved the workers and local people together with social assessment and environment assessment dated 28th November 2017 at UBED Conference room and previous date on 6th March 2017. In spite of that, few several meetings had been done according for the environment related concern dated 26th June 2018, 3rd of June 2018, and 17th June 2018. The management had organized few meetings throughout the year 2018 to increase the awareness of the workers and staff including the jungle trees planting program that the numbers will be increased to reduce the greenhouse gaseous effect.



MSPO ASSESSMENT REPORT - PART 4

4.5.2 Criterion 2: Efficiency of energy use and use of renewable energy

4.5.2.1 Indicator 1: Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.

Sighted the record of non-renewable energy that had been recorded in continuous improvement plan. The annual and monthly usage of petrol and diesel for 2018 had been recorded as per annually, e.g.

- i) January 2018 : Petrol = 7240 Liters, total Diesel = 16,910 → total 37,709.30
- ii) March 2018 : 6520 Liters, Diesel = 25594 liters → total 57,074.62
- iii) April 2018 : 8250 liters, Diesel = 35313 liters → total 78,747.99

Sighted the monthly record had been recorded to assess the use of non-renewable energy of the mill including lubricants usage 2018, such as in

- i) January 2018: ATF 3 45 liters, MEP 460 20 liters, SAE 50 43 liters
- ii) February 2018: ATF 3 60 liters, MEP 460 -10 liters, SAE 50 Nil

Based on the continuous improvement plan of the mill and reduction in usage of oil, lubricants and fuel as the priority of the mill, several steps had been introduce to reduce the dependency on it e.g. :close monitoring on vehicle usage and expected improvement from TNB for consistent supply and voiding usage of genset.

Status: Ok

4.5.2.2 Indicator 2: Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.

The estimate palm oil miller had recorded the direct usage of non-renewable energy in their operations including fossil fuel [diesel usage, petrol usage, and lubricant usage], electricity usage for the mill. sighted the yearly record of all operations that involving the usage of non-renewable product such as fuels and lubricant being recorded throughout the year 2017 and the record had been send to R&D Department of United Plantations for assessment of LCA by third party verifier, Dr. Jannick Schmidt.

Status: Ok

4.5.2.3 Indicator 3: The use of renewable energy should be applied where possible.

Ulu Bernam Optimill had installed and engine room that will utilized the fiber and shell produced by the mill for boiler usage and generate electricity for domestic usage. Sighted the usage of renewable energy for Ulu Bernam Optimill dated June 2018:

- i) FFB Processed = 120,170.68
- ii) CPO Produced = 20,738.40 MT
- iii) Fiber Produced @18% to FFB = 21630.72
- iv) Shell produce @6% FFB = 7210.24 MT

Sighted the utilization of by product, utilized weighted (Mt), Calorific Value (MJ/Kg), Renewable Energy used (GJ) and Renewable energy used GJ per ton CPO:

- i) Fiber = 21630.72 MT utilized → Calorifical value 18.8 MJ /Kg → RE Used 40.67 X10³ → RE Used GJ Per ton CPO 19.61
- ii) Shell = 7210.24 \rightarrow Calorifical value 19.5 MJ/Kg \rightarrow 14.06 X10³ \rightarrow 6.78 GJ

Sighted the record of KWH from renewable energy turbine at Ulu Bernam Optimill for year 2018:

- i) KWH Generated by turbine → 1,099,200.00
- ii) FFB Ton \rightarrow 100,417.00
- iii) CPO (ton) \rightarrow 20,581.00

Status:	Ok



MSPO ASSESSMENT REPORT - PART 4

4.5.3 Criterion 3: Waste management and disposal

4.5.3.1 Indicator 1: All waste products and sources of pollution shall be identified and documented

Sighted the waste product and sources of pollution shall be identified and documented as per details:

Type of waste	source	Disposal method	Action plan	remarks
Scheduled waste (e.g. Used Oil)	Spent Oil Gearbox	Used as lubrication for conveyor and rail line protection	 Corrosion protection for rail sleepers Sale to schedule waste manager To increase the no. of chain conveyors lubricant oil box at every conveyors 	Disposal to DOE approved waste oil Manager
POME	Palm Oil Mill processed waste water	Used as irrigation and fertilizer for oil palms in estate (land Application)	 100% land application via furrow Increase land application from 50.4 ha to 87.5 ha 	Increasing the hectarage of land

Sighted the sources of pollution that being categorized into waste such as:

- i) Noise Pollution from Mill machinery → Disposal Method enforce usage of ear plug
- ii) Air pollution from boiler flue gas → high chimney
- iii) Domestic waste form household → transported to waste dump
- iv) Spent batteries / Scrap Metals / Old tires / Boiler Ash and chemical container from the workshop

 → sell to authorized dealers

Status: Ok

4.5.3.2 Indicator 2: A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measures for:

- a) Identifying and monitoring sources of waste and pollution.
- b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.

The mill had developed a waste management plan for year 2018 that summarize the waste management plan throughout the year. Sighted the waste management action plan 2018 that include all the waste available as per details:

Type of waste	source	By whom	Targeted date	Disposal method	
Spent Oil	Spent oil in Gearbox	Assistant engineer + Mill Supervisor	ongoing	Disposal to waste man	nager
POME Palm Oil Mill Process waster		Assistant engineer + Mill Supervisor	ongoing	Used as irrigation for the estate	Oil Palm in
Empty Fruit Bunches	EFB	Assistant engineer + Mill Supervisor	ongoing	Transported to field as mulch for young palms	
Decanter Solid	Clarification of CPO	Assistant engineer + Mill Supervisor	ongoing	With EFB to Estate fo	r Mulching
Shell	FFB	Assistant engineer + Mill Supervisor	ongoing	Effluent Ponds at dis dwelling place	tance from
S	tatus:				Ok



MSPO ASSESSMENT REPORT - PART 4

4.5.3.3 Indicator 3: The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Wastes) Regulations, 2005.

Sighted the palm oil mill management related to scheduled waste management for Ulu Bernam Optimill including the notification, scheduled waste dispatch for Ulu Bernam Optimill, and consignment note for the estate to the registered collector as followed:

Notification of Scheduled waste on June 2018:

Waste category code	Waste of name	Balance MT	Quantity Generated
SW 102	Spent batteries	0.00	0.00
SW 109	Discarded fluorescent tubes	0.00	0.00
SW 305	Spent Lubricating Oil	0.00	0.00
SW 306	Spent Hydraulic Oil	0.00	0.00
SW 322	Spent Hexane + IPA	0.045	0.00
SW 409	Contaminated containers	0.00	0.00
SW 410	Spent Filters and rags	0.00	0.00

Based on the field visit on Scheduled waste store sighted there is few contaminated rags and hydraulic oil for month of 5th July 2018 kept in a store area. Sighted the submission date of the inventory on 3rd July 2018. The scheduled waste last record had been disposed, as sampled below:

- i) 22nd June 2018 SW 409 disposed container, bags or equipment contaminated with chemicals, pesticides and mineral oil → 0.12 MT disposed to KENEP Waste management Sdn Bhd
- ii) 22nd June 2018 → SW 410 Rags, Plastic, paper and filters → 0.04 MT disposed to KENEP Waste management
- iii) 26 December 2017 → 0.102 MT SW 305 Spent Lubricating oil → dispatched to SP Metro Sdn Bhd.

The company had engaged the external contractor for servicing the tractor, bob cat for fiber and machineries dated 31st May 2018, 7th May 2018 and 21st may 2018. The service is from Sime Darby Industrial Sdn Bhd ship to Jendarata Estate – main office.

Status: Ok

4.5.3.4 Indicator 4: Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.

Ulu Bernam Estate will be in charged regarding the Disposal waste management of Ulu Bernam Optimill. Sighted the record disposal form Ulu Bernam Waste contractor that deposed the domestic waste at proper Dumping Pit Ulu Bernam estate. Sighted the collection report had been done 3 times a week for the disposal collection.

Status:

4.5.4 Criterion 4: Reduction of pollution and emission including greenhouse gas

4.5.4.1 Indicator 1: An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.

The assessment of polluting activities had been recorded in data submission of Life Cycle Assessment for United Plantations recorded for year 2017 including:

- i) Fibre burned =140.0
- ii) Shells Burned = 60.0
- iii) EFB Send to land application = 220
- iv) Cyclone fibre = 26.390
- v) Kernel Shell = 8797.0
- vi) POME = 102,627.00
- vii) Fossil Fuel usage = Diesel 101862.00, Petrol 34,647.00, Hydraulic Oil 7437.00
- viii) Isokinetic Monitoring = Boiler no. 2 dated tested = 27th June 2018



MSPO ASSESSMENT REPORT - PART 4

4.5.4.2 Indicator 2: An action plan to reduce identified significant pollutants and emissions shall be established and implemented.

Action plan to reduce the significant pollutants and emission had been established based on the waste management plan of the mill:

- BOD from final discharge of effluent ponds → maintain the efficiency of the effluent ponding system by implementing desludging works
- Dust emission from the mill: to maintain the current standard by maintaining the efficiency of the VORSEP System
- Methane Gas Captures → action plan will be reduce in tandem with FFB Production once the OPTIMILL start operation
- Diesel usage by oil mill → diesel footprint expected to reduce further after the commissioning of the OPTIMILL

Based on the Action plan with continuous improvement by the mill, it was found that the mill had implemented the action plan for year 2018 for the waste and source of pollution as per details:

- Scheduled waste → spent oil in Gearbox → used for lubricating elevator conveyor chain and rail sleeper protection → action plan: corrosion protection for rail sleepers, sale to schedule waste collectors, to increase the no of chain conveyors lubricant oil box at every conveyors, to evaluate the efficacy of food grade lubricant → disposal to DOE approved waste oil handler.
- Air pollution → source Boiler flue gas → boiler stack with dust collector system → action plan : CCTV for Chimney smoke monitoring , On line monitoring , VORSEP System to further reduce the dust emission < 150 mg /m3

Status: Ok

4.5.4.3 Indicator 3: Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.

There is certificate of analysis date on 20 June 2018 by Chemvi Laboratory Sdn Bhd (Standards Malaysia Accredited Laboratory MS ISO/IEC 17025 testing SAMM No.213. Example

Location	Test Parameter		Months (Results)		Unit	Thresholds			
		Jan	Feb	March	April	May	June	Oilit	Tillesilolus
Fat Pit	рН		-	-	-	-	4.13	-	
(Inside	BOD		-	-	-	-	8488	Mg/l	
Mill)	Total suspended Solids	-	-	-	-	-	11739	Mg/l	
Effluent	рН	-	-	-	-	-	4.61	-	
pond 2	BOD	-	-	-	-	-	5883	Mg/l	
	Total suspended Solids	-	-	-	-	-	732	Mg/l	

The final discharge in pond number 8 (Aerobic pond), there is no liquid water in pond number 8. The water is still in pond number 7 (Aerobic Pond) and had been testing on June 2018. The company didn't discharge liquid waste for land application yet because the POME does not yet reach pond number 8. But the company still conducted testing analysis in May and April in Cooling Pond. The company was conducted testing liquid waste by Chemvi Laboratory Sdn Bhd on 15 May 2018 located in cooling pond 1 & 2 with the results below:

- **a.** Effluent water: PH: 4.79; COD: 23430 mg/l; BOD3: 6086 mg/l (15 May 2018).
- **b.** Effluent water: PH: 4.79; COD: 24046 mg/l; BOD: 1317 mg/l (27 April 2018).

Status: Ok



MSPO ASSESSMENT REPORT - PART 4

4.5.5 Criterion 5: Natural water resources

4.5.5.1 Indicator 1: The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:

- a) Assessment of water usage and sources of supply.
- b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.
- c) Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).
- d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.
- e) Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.
- f) Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.

Sighted the schematic Diagram of river water treatment at the Optimill water catchment \rightarrow Pump into Water Reservoir \rightarrow Mix Soda and Alum Polymer In premix tank \rightarrow water settling ponds (3 settling Tank) \rightarrow Concrete Settling tank \rightarrow filter house \rightarrow Into overhead storage tank \rightarrow Mill and domestic usage. Planning for water management such as constructing/desilting should be done systematically, desilting works should preferably be planned for the dries months, determine the drains to be constructed/desilted and etc. The frequency of desilting may vary depending on existing conditions and terrain. The company have water management SOP issued in 10 December 2007.

Status: Ok

4.5.5.2 Indicator 2: Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.

The mill has developed a conventional system pond for POME treatment that will phased out the effluent in the mill. Sighted the flow diagram of effluent treatment which include Sterilizer and Sludge trap \rightarrow Condensate Sump \rightarrow cooling pond \rightarrow 2 Mixing Pond \rightarrow 4 Anaerobic Pond \rightarrow intermediate sump \rightarrow 2 Facultative pond \rightarrow 2 algae Pond A1 \rightarrow 2 Algae Pond B2 \rightarrow Bio polishing Plant \rightarrow final Discharge. Based on the evident of finals discharge that being submitted to DOE, sighted that the analysis on final discharge is in accordance to the national regulation of Malaysia. The mill also had installed the biogas plant that will capture the methane and flaring it.

Status: Ok

4.5.5.3 Indicator 3: Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.

Sighted the JP – regulation DOE license regarding the POME discharge limits to water course not more than 100 Mg/I as per regulation. The mill had taken the final discharge of POME Result every month. Sighted the mill had done the water result analysis for POME final discharge at pond no 8 to water courses.

Status: Ok

4.6 PRINCIPLE 6: BEST PRACTICES

4.6.1 Criterion 1: Mill management

4.6.1.1 Indicator 1: Standard operating procedures shall be appropriately documented and consistently implemented and monitored.

The mill had developed SOP for operation Mill that has been appropriately documented and revised accordingly whenever there is a revision on operation based on the Social and environmental assessment that includes of SOP at Sterilizer Bay and Its HIRARC, SOP at Marshalling Yard, SOP at Pressing station, SOP at clarification Station and etc. Based on the SOP documentation, the company had developed into PPE usage, before starting work, While in operation and after work for the whole SOP.



MSPO ASSESSMENT REPORT - PART 4

Status: Ok 4.6.1.2 Indicator 2: All palm oil mills shall implement best practices. Based on the site verification sighted the oil mill had implemented the operation according to the SOP of company. The operation including the workers PPE, during working, while operation before and after work. Sighted the training had been done throughout the year for all the workers (72 workers) including the workshop operation. The awareness training had been done accordingly during muster ground at the mill. Based on the mill visits location at the processing area, workshop, scheduled waste store and biogas plant, the mill had maintained a high standard of SOP in their workmanship through entire mill operation. Interview had been done with the store keeper, person in charge of scheduled waste and biogas plant, the best practices had been done at the highest standard of operation according to mill SOP. Status: Ok 4.6.2 Criterion 2: Economic and financial viability plan 4.6.2.1 Indicator 1: A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. Based on the documentation on Ulu Bernam Optimill, Sighted the budget had been made as per engineering Department including: Crop Projection for 2019 and 2021- at 22% Oil and 5.3% Kernel FFB - 83,953: CPO 18,470.00 at 22%: Kernel 4617 at 5.5 % ii) 2019 = FFB 88516, CPO 19473 @22%, Kernel 4691 @5.3% iii) 2020 = FFB 91411, CPO 20110 @22%, Kernel 4845 @ 5.3% The summary budget of Crop including extraction Rate OER and KER (225 and 5.3%) with general charges had been made on 2017 for budget 2018 of entire operations of the mill based on crop projection. Status: Ok 4.6.3 Criterion 3: Transparent and fair price dealing **4.6.3.1 Indicator 1:** Pricing mechanisms for the products and other services shall be documented and effectively Ulu Bernam Optimill Mill does not receive outside crop. The pricing mechanism adopted is for worker salary which follow strictly to MAPA/NUPW. Status: Ok **4.6.3.2 Indicator 2:** All contracts shall be fair, legal and transparent and agreed payments shall be made in a timely manner. Sighted the contracts for the transporter between United Plantations Berhad, sampled Sakthy Transport, Pengangkutan Terasek and Uji Sakti. Based on the contract sighted the agreement consists of the agreed to follows term and conditions. Price for CPO Tanker Transportation include Jenderata to Port Klang, Jenderata to Dengkil, Jenderata to Rawang, Jenderata to UIE, Jendarata to Ulu Bernam, Jenderata to Ulu Basir, UIE to Lumut, UIE to Port Klang, UIE to Unitata. Status: Ok 4.6.4 Criterion 4: Contractor 4.6.4.1 Indicator 1: In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. There was a centralize training conducted on 30/5/2018 explaining RSPO and MSPO policies and requirements. The evidence showed notification letters, photographic evidence and attendance list. Status: Ok 4.6.4.2 Indicator 2: The management shall provide evidence of agreed contracts with the contractor. Agreed contract with contractors had been sighted as per document on contracts with Sri Naresh Agency that include the agreement dated from 1st January 2018 to 31st December 2018 unless terminated under clause 7 in which signed and delivered by the presence of Contactor, company secretary of United Plantations Berhad

Ok

Status:



MSPO ASSESSMENT REPORT - PART 4

4.6.4.3 Indicator 3: The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.

Yes. The management are accepting the MSPO Approved auditors whenever the physical inspection required as per transparency commitment.

Status:

Ok

3.2 Identification of findings, Corrective actions, observations, opportunity for improvement and noteworthy positive components.

3.2.1 Noteworthy Positive Components at Stage-2

No	Description
1	This is a brand new mill with semi automation that reduces manpower mobilization and FFB handling from receiving station to loading ramp.
2	The double layer Vorsep Dust Collector System commissioned to meet the DOE's Clean Air Regulation that to be below 150mg/m³ from the current standard of 400mg/m³.
3	Good initiative from the management to increase the number of jungle trees planting in Ulu Bernam OPTIMILL

3.2.2 *Identification of Non-conformity at Stage-2* – No non-conformities were raised.

3.2.3 Opportunity for Improvement (OFI)

No	Ref Std.	Descriptions
1	4.3.1.1	 The mill management has initiated the Fire Certificate application [Fire Services Act 1988 and Fire Services (Fire Certificate) Regulations 2001. Sighted a letter from the Majlis Perbandaran Teluk Intan dated 08/03/17 reference to process 3 – Notifikasi (Permulaan Kerja Binaan). CEMS monitoring is in progress of installation by contractor and was communicated to DOE on the progress. Quarterly Return Form as per First Schedule of the EQ (Prescribed Premises) (Crude Palm-Oil) Regulations, 1977 – was not able report to DOE for 1st Quarter 2018 as the mill was not having continuous operation and therefore the DOE system was not able to receive the insufficient inputs. As for the 2nd quarter, the mill will be submitting by 15/07/18.
2	4.4.4.2	Consideration to improve the method of taking flowmeter reading at water processing plant of Ulu Bernam Optimill.

3.2.4 Summary of Arising Issues from Public, Management, and Auditor Response

Public Issues (Institution/ NGO/Community)	Auditor Responses		
Wednesday, July 11th 2018.			
Gender Committee United Plantations.			
The organization of gender committee consist of Ulu Bernam Optimill, Sungei Erong Estate, Changkat Mentri Estate, Ulu Bernam Estate and Lima Blas Estate. The policy of gender and The grievance	This has been in accordance with criterion 6.9.		



MSPO ASSESSMENT REPORT - PART 4

D.LU.	
Public Issues (Institution/ NGO/Community)	Auditor Responses
Redressal procedure has been socialized to the members. They have been know regarding the procedure. During Surveillance audit there is no complaint from workers and there isn't case regarding sexual harassment.	
Labour Union United Plantations.	I
There is guest worker's welfare committee has been establishing and valid from January 1st, 2018. The members consist of Bangladesh workers, Indian workers, and Indonesian workers.	This has been in accordance with criterion 6.6.
Labor union policy has been socialized to the workers include in Human Rights Policy. The united plantation respects the rights of all personnel to form, join & participate in registered trade unions.	
There isn't complaint from workers regarding wages, facilities of workers, worker's welfare, insurance and others. They have been satisfied with the company.	
Workers of Ulu Bernam Estate and Workers of Sungei Erong Est (1 Bangladesh worker, 1 Indonesian worker)	ate.
Based interview with Bangladesh worker, he has been working for 10 years in the Sungei Erong Estate and he felt satisfied working in united plantations. The company give them proper facilities such as adequate housing, subsidize of electricity and water supply. There is shop for groceries shopping and the basic amenities has been provided by UP.	This has been in accordance with criterion 6.5.
The Indonesian workers is feel the same, he has been satisfied with the UP Management. The company has provided the facilities such as hospital, shop lot, and sport infrastructure.	
Representative from Erong Village.	
The community has complained regarding steam sound in Bernam Optimill is too noise.	The unit management always conducted maintenance of machines in Mill Operational and has been done planting woody plants in Mill area.

Summary of findings and Recommendation

MAJOR	MINOR	OFI		
0	0	2		

Recommendation of Certification:

Due to No Major Non- Conformity finding, Ulu Bernam Optimill is $\underline{\sf RECOMMENDED}$ for MSPO Part 4 certification.

mutu certification international

MUTUAGUNG LESTARI MALAYSIA SDN BHD

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT	OF INTERNAL RESPONSIBILITY			
4.1	Formal Sign-off of Assessment Findings				
	Hereunder sign by management representative from inspendence for all content explained in this assessment report, in				
	Signed on behalf of:				
	Company Name Management Representative	Mutuagung Lestari Lead Auditor			
	C. Mathews 24/07/2018	Mahaswaran Maliyapan 24/07/2018			



MSPO ASSESSMENT REPORT - PART 4

Appendix 1. Glossary

MCDO	Τ.	Malaurian Custainahla Dalm Oil
MSPO	<u> </u> :	Malaysian Sustainable Palm Oil
MPOB	1:	Malaysia Palm Oil Board
ARM	:	Agriculture Reference Manual
BOD	:	Biological Oxygen Demand
BTS (FFB)	:	Buah Tandan Segar (Fresh Fruit Bunch)
CePPOME	:	Certified Environmental Professional in the Treatment of POME
CEMS	:	Continuous Emission Monitoring System
CPO	:	Crude Palm Oil
CHRA	:	Chemical Hazard Risk Assessment
CLC	:	Child Learning Centre
CSA	:	Conservation Site Area
CSR	:	Corporate Social Responsibility
COBC	:	Code of Business Conduct
COD	:	Chemical Oxygen Demand
DOE	:	Department of Environmental
EFB	:	Empty Fruit Bunch
EMS	:	Environment Management System
EPSM	:	Environmental Protection Society Malaysia
EQMS	:	Environment Quality Management System
FY	:	Financial Year
FPIC	:	Free Prior and Informed Consent
GHG	:	Green House Gases
HCV	:	High Conservation Value
HIRAC	:	Hazard Identification and Risk Assessment Control (HIRAC)
HSE	:	Health Safety and Environment
HQ	:	Head Quarter
IUCN	:	International Union for Conservation of Nature
KER	:	Kernel Extraction Rate
KKS (POM)	:	Kilang Kelapa Sawit (Palm Oil Mill)
LC	:	Land Clearing
LCC	:	Legium Cover Crop
LOTO	:	Log Out and Take Out
LTA	:	Lost Time Accident
MPOB	:	Malaysian Palm Oil Board
MSDS	:	Material Safety Data Sheet
NCR	:	Non-Conformance Report
<u>u</u>		

MSPO PART 4 Report (1.0)



NPP	:	New Planting Procedure	
NWSDM	:	National Council of Welfare & Social Development Malaysia	
NUPW	:	National Union Plantation Workers	
OFI	:	Opportunity for Improvement	
OHS	:	Occupational Health and Safety	
OHSA	:	Occupational Health and Safety Assessment	
OER	:	Oil extraction Rate	
PANAP	:	Pesticide Action Network Asia and the Pacific	
PK	:	Palm Kernel	
PPE	:	Personal Protective Equipment	
POME	:	Palm Oil Mill Effluent	
POM	:	Palm Oil Mill	
PSQM	:	Plantation Services Quality Management	
PSS	:	Pictorial Safety Standard	
RSPO	:	RoundTable on Sustainable on Palm Oil	
RTE	:	Rare, Threatened, or Endangered	
SIA	:	Social Impact Assessment	
SOP	:	Standard Operating Procedure	
SOM	:	Standard Operation Manual	
SPMS	:	Sustainable Plantation Management System	
SOCSO	:	Social Security Organization	
SW		Schedule Waste	
TQEM	:	Total Quality Environmental Management	
WTP	:	Water Treatment Plan	