United Plantations Bhd

Palm oil assessment

Total score: 84.4%

Latest update: October 2019
Next scheduled: October 2020

About this company: Founded in 1917, United Plantations is a Malaysia-based company and their core business activities include oil palm cultivation and harvesting and processing fresh fruit bunches into crude palm oil and palm kernel. The balance of the revenue is mainly derived from United Plantations' Unitata refinery based in Perak, Malaysia. The company also own coconut and banana plantations and through its subsidiaries, manufactures edible oils, fats, soap products and cocoa butter. United Plantations' oil palm plantation estates are located in Malaysia and Indonesia.

Parent company: United International Enterprises Ltd

Landbank (oil palm) 59,432 hectares
Palm cultivation revenue: 31%
Market cap: 1,225,751,927 USD
Thomson Reuters ticker: UTPS.KL
Bloomberg ticker: UPL MK
ISIN: MYL20890000
RSPO member? Yes
Other initiatives: Malaysian Sustainable Palm Oil (MSPO)
Activities: Oil palm cultivation, milling, palm oil refining, trading and distribution
Locations: Malaysia (Perak, Selangor), Indonesia (Central Kalimantan)

Headquarters: Malaysia
Parent website: http://uie.dk
Website: http://www.unitedplantations.com

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Total: 163.69 / 194 84.4%

Sustainability policy and leadership

2 media reports

1. Sustainable palm oil policy or commitment for all its operations? ✓ 1 / 1 Source
2. Sustainable palm oil policy or commitment applies to all suppliers? ✓ 1 / 1 Source
3. High-level position of responsibility for sustainability? ✓ 1 / 1 Source

The company has a Group Sustainability Committee, with the overall sustainability objectives, targets and priorities being the responsibility of the Executive Committee headed by the Chief Executive Director.
4. One or more members within the board of the company have responsibility for sustainability?  
Chief Executive Director

5. Percentage or number of women in senior management team?  
1 (10%)  

6. Percentage or number of women board members?  
0%  

7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with palm oil production?  

8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with palm oil production?  
The company has cooperated with Copenhagen Zoo since 2007 on biodiversity and wildlife protection, and regularly interacts in multi-stakeholder engagements with the governments in the countries where it operates

9. Sustainability report published within last two years?  
The company's Sustainability Report is contained within its Annual Report

10. Reports through standardised reporting systems?  
GRI, CDP

11. Verification report on compliance with POIG Charter, if a POIG member?  
This indicator is disabled as the company is not a POIG member

12. Climate risks assessment available?  

13. Total land area managed/controlled for oil palm (ha)?  
59,432

14. Total oil palm planted area (ha)?  
43,335 - Contains plasma

15. Plasma/scheme smallholders planted area (ha)?  
1,316
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</table>
| 16. | Unplanted (areas designated for future planting) (ha)?  
500 - Data as of 2017 |
| 17. | Conservation set-aside area, including HCV area (ha)?  
8,441 - The company reports 8,239 ha of land set aside in its Indonesian operations and the remaining amount is split amongst its various Malaysian plantations |
| 18. | Area for infrastructure (ha)?  
1,829 - Figure described as “buildings, roads, drains, air-strip, nurseries, toddy tapping areas, railway, OPTIMILL etc.” |
| 19. | Maps of estates/management units?  
The company uploaded a shapefile as part of its 2018 ACOP and declared that it counted for 100% of its concession sites |
| 20. | Maps of scheme/plasma smallholders? |
| 21. | Names and locations of all third-party supplying plantations? |
| 22. | Number of company-owned mills?  
5 - Four in Malaysia and one in Indonesia |
| 23. | Names and coordinates of company-owned mills? |
| 24. | Number (or percentage) of company-owned mills that source from company-owned plantations and/or third-party plantations?  
1 - The company states that its Indonesian mill is the only mill that sources outside FFB |
| 25. | Total volumes (or percentages) sourced by company-owned mills that come from company-owned plantations and/or third-party plantations?  
The company reports that every Malaysian mill sources 100% FFB from its own plantations, whilst its Indonesian mill sources 100% FFB from outside plantations |
| 26. | Number of supplier mills? |
| 27. | Names and coordinates of all third-party supplying mills? |
| 28. | Number (or percentage) of third-party supplier mills that source from their own plantations and/or third-party plantations? |
| 29. | Total volumes (or percentages) sourced from third-party supplier mills that come from their own plantations and/or third-party plantations? |
| 30. | Total volume (or percentage) sourced for refineries that comes from intermediary traders and/or |
31. Time-bound commitment to achieve 100% traceability to mill level?

- The company has achieved 100% traceability to mill level

32. Percentage of supply traceable to mill level?

100%

33. Time-bound commitment to achieve 100% traceability to plantation level?

- The company states it is committed to “Full certification and production and use of segregated and traceable palm oil is expected to be reached in 2019, including any outside crop that is purchased”

34. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level?

100%

35. Percentage of fresh fruit bunches (FFB) from supplier mills traceable to plantation level?

No source

36. Publishes traceability data at refinery level?

- The company reports traceability to mill level for its refinery. It states that 100% of CPO can be traced back to plantations, however CPK is only traceable to mill level

37. Publishes traceability data at crusher level?

This indicator is disabled as the company does not own crushing facilities

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**Deforestation and biodiversity**

12.79 / 18 71.1%

- 4 media reports

38. Commitment to zero deforestation or zero conversion of natural ecosystems?

- No source

39. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?

- No source

40. Criteria for defining deforestation?

- Primary forest, HCV, HCS

41. Evidence of monitoring deforestation?

- The company provides details of controlling illegal activities in conservation areas in one of its subsidiaries PT SSS, including monitoring illegal logging and illegal land clearing. It also provides details on its use of GIS databases and SMART software. Data as of 2016
<p>| | | |</p>
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<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>42. Amount of illegal/non-compliant deforestation recorded in own operations?</td>
<td>✗</td>
<td>0 / 1</td>
</tr>
<tr>
<td>43. Amount of illegal/non-compliant deforestation recorded in supplier operations?</td>
<td>✗</td>
<td>0 / 1</td>
</tr>
<tr>
<td>44. Commitment to restoration of non-compliant deforestation/conversion?</td>
<td>✗</td>
<td>0.5 / 1</td>
</tr>
<tr>
<td>45. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>46. Implementing a landscape or jurisdictional level approach?</td>
<td>✗</td>
<td>0.66 / 1</td>
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<tr>
<td>47. Commitment to biodiversity conservation?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>48. Commitment to biodiversity conservation applies to all suppliers?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>49. Identified species of conservation concern, referencing international or national system of species classification?</td>
<td>✗</td>
<td>0.63 / 1</td>
</tr>
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<td></td>
<td></td>
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<tr>
<td>50. Examples of species and/or habitat conservation management?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>51. Commitment to no hunting or only sustainable hunting of species?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>52. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</td>
<td>✗</td>
<td>1 / 1</td>
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**HCV, HCS and impact assessments**

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<tr>
<td>53. Commitment to conduct High Conservation Value (HCV) assessments?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>54. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
<tr>
<td>55. High Conservation Value (HCV) assessments for planting undertaken prior to January 2015, and</td>
<td>✗</td>
<td>1 / 1</td>
</tr>
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</table>

**Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume**
There is public availability of the following HCV assessments:
Central Kalimantan: PT Surya Sawit Sejati

- **56. High Conservation Value (HCV) assessments for all estates planted since January 2015?**
  This indicator is disabled as the company has not undertaken any new planting since January 2015

- **57. High Conservation Value (HCV) management and monitoring plans for all estates planted since January 2015?**
  This indicator is disabled as the company has not undertaken any new planting since January 2015

- **58. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network’s Assessor Licensing Scheme (ALS)?**
  ✔ 1 / 1  Source

- **59. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network’s Assessor Licensing Scheme (ALS) applies to all suppliers?**
  ✔ 1 / 1  Source

- **60. Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel?**
  This indicator is disabled as the company has not undertaken any new planting since January 2015

- **61. Commitment to the High Carbon Stock (HCS) Approach?**
  ✔ 1 / 1  Source

- **62. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?**
  ✔ 1 / 1  Source

- **63. High Carbon Stock (HCS) assessments?**
  ✔ 1 / 1  Source

- **64. Commitment to conduct social and environmental impact assessments (SEIAs)?**
  The company commits to SEIAs for all new planting according to its NPP
  ✔ 1 / 1  Source

- **65. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?**
  ✔ 1 / 1  Source

- **66. Social and environmental impact assessments (SEIAs) undertaken, and associated management and monitoring plans?**
  There is public availability of the following SEIA:
  Central Kalimantan: PT Surya Sawit Sejati

- **67. Commitment to no planting on peat of any depth?**
  ✔ 1 / 1  Source

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> **Peat, fire and GHG emissions**

16.88% / 19
88.8%

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The company commits to no new development of peatland, regardless of depth. For existing plantings on peat the company only replants on peat which is less than 3m in depth.

<table>
<thead>
<tr>
<th>Question</th>
<th>Status</th>
<th>Source</th>
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<tbody>
<tr>
<td>68. Commitment to no planting on peat of any depth applies to all suppliers?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>69. Implementation of commitment to no planting on peat of any depth</td>
<td>✗ 0.75/1</td>
<td></td>
</tr>
<tr>
<td>70. Landbank or planted area on peat?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>71. Commitment to best management practices for soils and peat?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>72. Commitment to best management practices for soils and peat applies to all suppliers?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>73. Evidence of best management practices for soils and peat?</td>
<td>✔ 1/1</td>
<td>0.63/1</td>
</tr>
<tr>
<td>74. Commitment to zero burning?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>75. Commitment to zero burning applies to all suppliers?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>76. Evidence of fire monitoring and management?</td>
<td>✗ 0.75/2</td>
<td></td>
</tr>
<tr>
<td>77. Details/number of hotspots/fires in company estates?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>78. Details/number of hotspots/fires within surrounding landscape/smallholders?</td>
<td>✔ 1/1</td>
<td></td>
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<tr>
<td>79. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>80. Methodology used to calculate GHG emissions?</td>
<td>✔ 1/1</td>
<td></td>
</tr>
<tr>
<td>81. Progress towards commitment to reduce GHG emissions intensity?</td>
<td>✗ 0.75/1</td>
<td></td>
</tr>
<tr>
<td>82. Percentage of mills with methane capture (100%)?</td>
<td>✔ 1/1</td>
<td></td>
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</tbody>
</table>
83. GHG emissions intensity?
The company reports a reduction to 1.18 kg CO2-eq for every 1 kg of refined palm oil produced in its 2018 Annual Report.

84. GHG emissions from land use change?
This indicator is disabled as the company has not undertaken any new land development within the past five years.

85. Time-bound commitment to improve water use intensity?
The company has a target to reduce water consumption by 5% compared to 2015 levels of 80 gallons per capita by 2019 but does not have a commitment to reduce water use in its mills.

86. Progress towards commitment on water use intensity?

87. Water use intensity?
In Malaysia, the rate reduced from 1.8 MT water/MT FFB in 2017 to 1.5 in 2018. In Indonesia, it fell from 1.4 in 2017 to 1.2 in 2018.

88. Time-bound commitment to improve water quality (BOD and COD)?

89. Progress towards commitment on water quality (BOD and COD)?

90. Treatment of palm oil mill effluent (POME) and/or palm oil refinery effluent (PORE)?
The company has treatment plans in place for POME, but does not mention PORE in their reporting.

91. Commitment to protect natural waterways through buffer zones?

92. Implementation of commitment to protect natural waterways through buffer zones?
Points for external verification have been awarded on the basis of the company’s RSPO certified landbank/volume.

93. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?

94. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?

95. Implementation of commitment to reduce chemical usage?
Points for external verification have been awarded on the basis of the company’s RSPO certified landbank/volume.
96. Chemical usage per ha or list of chemicals used?  

97. Commitment to no use of paraquat?  

98. Commitment to no use of paraquat applies to all suppliers?  

99. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?  
The company states "chemicals that fall under the WHO Class 1A & 1B and Stockholm or Rotterdam Conventions are only used in emergency and/or exceptional circumstances such as pest outbreaks"  

100. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?  

101. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?  
The company states "chemicals that fall under the WHO Class 1A & 1B and Stockholm or Rotterdam Conventions are only used in emergency and/or exceptional circumstances such as pest outbreaks"  

102. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?  

103. Integrated Pest Management (IPM) approach?  
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume  

Community, land and labour rights  

104. Commitment to human rights?  

105. Commitment to human rights applies to all suppliers?  

106. Progress on human rights commitment?  
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume  

107. Commitment to respect legal and customary land tenure rights?
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<th>Score</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>108. Commitment to legal and customary land rights applies to all suppliers?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>109. Details of process for addressing land conflicts available?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>The company has a Standard Operating Procedure for Land Dispute Settlement</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>110. Commitment to respect indigenous and local communities' rights?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>111. Commitment to indigenous and local communities' rights applies to all suppliers?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>The commitment does not refer to the UN Declaration or ILO 169</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>112. Examples of local stakeholder engagement to prevent conflicts?</td>
<td>✔️</td>
<td>1/1</td>
<td>+0.66</td>
</tr>
<tr>
<td>The company reports that it holds town hall style meetings to address local stakeholder conflicts. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume</td>
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<tr>
<td>113. Commitment to free, prior and informed consent (FPIC)?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>114. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>115. Details of free, prior and informed consent (FPIC) process available?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>116. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>117. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced, applies to all suppliers?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>118. Commitment to mitigate impacts on food security?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>119. Commitment to mitigate impacts on food security applies to all suppliers?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>120. Progress on commitment to mitigate impacts on food security?</td>
<td></td>
<td>0.5/2</td>
<td></td>
</tr>
<tr>
<td>121. Commitment to provide essential community services and facilities?</td>
<td>✔️</td>
<td>1/1</td>
<td></td>
</tr>
<tr>
<td>122. Progress on commitment to provide essential community services and facilities?</td>
<td>✔️</td>
<td>1/1</td>
<td>+0.63</td>
</tr>
</tbody>
</table>
The company ensures its policies apply to its employees, including both permanent and temporary workers, and it has a human rights policy and guest workers policy.
### Commitment to address occupational health and safety applies to all suppliers?

- **Yes**

### Reduction of time lost due to work-based injuries?

- **Yes**

The company's Lost Time Injury Frequency rate dropped from 9.04 in 2017 to 6.56 in 2018.

### Time lost due to work-based injuries?

- **Yes**


### Zero fatalities as a result of work-based accidents?

- **No**

### Number of fatalities as a result of work-based accidents?

- **Yes**

1 - Total fatalities in 2018

### Provision of personal protective equipment and related training?

- **Yes**

Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

### Member of the Roundtable on Sustainable Palm Oil (RSPO)?

- **Yes**

2,004

### RSPO-certified within three years of joining the RSPO or by November 2010 for companies joining prior to finalisation of the RSPO certification systems in November 2007?

- **Yes**

2008

### Submitted most recent RSPO Annual Communication of Progress (ACOP)?

- **Yes**

The company submitted both a Grower and a Processor and Trader ACOP.

### Listed all countries and regions in which operates in most recent RSPO Annual Communication of Progress (ACOP)?

- **Yes**

The company states all of the countries and regions in which it operates: Malaysia (Perak, Selangor), Indonesia (Central Kalimantan).

### Time-bound plan for achieving 100% RSPO certification of estates and mills within five years or achieved 100% RSPO-certification of estates?

- **Yes**

2020

### Percentage of area (ha) RSPO-certified?

- **63%**
149. Percentage of scheme/plasma smallholders (ha) RSPO-certified?  
0 (0%)

150. Percentage of mills RSPO-certified?  
5 (100%)

151. Time-bound plan for achieving 100% RSPO certification of scheme/plasma/associated smallholders and outgrowers within five years or target already achieved?  
2021

152. Percentage of FFB supply (tonnes) from independent smallholders/outgrowers/third-party FFB suppliers that is RSPO-certified?  
0 (0%)

153. Year expected to achieve 100% RSPO certification of all palm product processing facilities?  
2008 - Was stated as 2010 in 2017 ACOP

154. Percentage of all palm oil and oil palm products handled/traded/processed (tonnes) that is RSPO-certified?  
173,841 (66.2%)

155. Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains?  
Mass Balance, Segregated, Identity Preserved. Information is from 2017 ACOP as information not provided in 2018 ACOP

156. Indonesia Sustainable Palm Oil (ISPO) certified (100%)?  
[Externally verified] The company's Indonesian estate Surya Sawit Sejati was certified in 2018

157. Malaysia Sustainable Palm Oil (MSPO) certified?  
The company states that the MSPO Certification was obtained in September 2018 for all mills and estates in Malaysia

158. Certified under voluntary sustainability certification scheme (e.g. ISCC, SAS, RSB, etc.)?  

159. Commitment to support smallholders?  
Support with land development, provides training and financial support. Points for external verification have been

160. Programme to support scheme/plasma smallholders?  
Yes
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<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>161. Percentage of scheme/plasma smallholders involved in programme?</td>
<td>0.75 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>162. Programme to support independent smallholders/outgrowers?</td>
<td>1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>Providing training on good agricultural practices, health and safety and fire management. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</td>
<td></td>
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</tr>
<tr>
<td>163. Percentage of independent smallholders/outgrowers involved in programme?</td>
<td>0.5 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>164. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?</td>
<td>1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>165. Percentage of suppliers assessed and/or engaged on compliance with company requirements?</td>
<td>0.75 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>35 - The company states that it assessed 35/45 suppliers in 2018.</td>
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<tr>
<td>166. Time-bound plan to engage with all high-risk mills within three years?</td>
<td>1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>167. Programme to support high-risk mills to become compliant with sourcing policies?</td>
<td>0.75 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>168. Regularly engages with a subset of high-risk mills?</td>
<td>0.5 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>169. Procedures in place to assess all own and third-party supplying palm oil mills for risk level?</td>
<td>1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>170. Regularly assesses and categorises the risk level of all own and third-party supplying mills?</td>
<td>0.75 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>171. Regularly reports the risk level of all own and third-party supplying mills identified in its supply chain?</td>
<td>0.75 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>172. Suspension or exclusion criteria for suppliers?</td>
<td>1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>173. Time-bound action plans (including Key Performance Indicators) for suppliers to be in compliance with palm oil sourcing commitments?</td>
<td>1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>174. Proportion of direct and indirect supply that comes from palm oil plantations which are compliant with palm oil sourcing policies?</td>
<td>0.5 / 1</td>
<td>Source</td>
</tr>
</tbody>
</table>

Governance and grievances

83.3%
<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>175. Commitment to ethical conduct and prohibition of corruption?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>176. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>177. Progress on commitment to ethical conduct and prohibition of corruption?</td>
<td>✓ 1 / 1</td>
<td>Source Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume</td>
</tr>
<tr>
<td>178. Disclosure of the company's management approach to tax and payments to governments?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>179. Whistleblowing procedure?</td>
<td>P 0.5 / 1</td>
<td>Source The company has a whistleblowing policy, but the procedure is not detailed</td>
</tr>
<tr>
<td>180. Own grievance or complaints system open to all stakeholders?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>181. Details of complaints and grievances disclosed?</td>
<td>P 0.5 / 1</td>
<td>Source The company details a summary of land dispute cases from 2016-2018, but not other types of grievances</td>
</tr>
</tbody>
</table>