

GLENEALY PLANTATIONS SDN BHD

(3453-X)

Glenealy Plantations Sdn Bhd: A Declaration of Commitment to No Deforestation, No Peat, and No Exploitation (NDPE)

20 April 2021.

1. Introduction

Glenealy Plantations Sdn Bhd (GPSB), an entity solely involved in oil palm development and management, is committed to systematically adopting the global sustainability requirements of the palm oil industry. It will be a phased approach, requiring an in-depth analysis of all the requirements, implementing these requirements, and then achieving full sustainability over a period of 24 months. GPSB has demonstrated its commitment by undertaking the following:

- i. Formulating and adopting a NDPE Policy,
- ii. Enforcing a Planting Moratorium,
- iii. Committed to undertaking HCS-HCV assessment for future new plantings,
- iv. Undertaking an Independent HCS Loss Assessment,
- v. Establishing a HCS Recovery Site (Loss compensation), and
- vi. Initiating Stakeholder Engagement.

A timebound plan has been formulated to translate all its commitments into actions. The implementation exercise has been set in motion across all GPSB's oil palm concessions in Malaysia and Indonesia.

An elaboration of the GPSB's commitments are detailed below.

2. NDPE Policy

GPSB has formulated, and adopted its NDPE policy since 10th April 2020 with the following key components:

- **Transparency** – openness on matters related to new planting, conservation, and traceability,
- **No Deforestation and Protection of HCV-HCS Areas** - no future development in any HCV and HCS areas identified,
- **Zero Burning** - 'No Open Burning' policy is adhered to in any new development or replanting,
- **No Peat** - GPSB has no plantings on peat and commits to no new development in peat areas of any depth,
- **No Exploitation** - upholding the Universal Declaration of Human Rights by the United Nations,
- **Respect FPIC** - development will not proceed without the Free, Prior, and Informed Consent (FPIC) of landowners and users with legal rights, and
- **Grievance Mechanism** – implement a functional grievance mechanism benefiting all parties.

3. Planting Moratorium

A planting moratorium has been put into effect since 15th April 2020 in its Malaysian and Indonesian oil palm concessions. The concessions are:

1. Lana Estate, Sarawak, Malaysia,
2. Jelalong Estate, Sarawak, Malaysia,
3. Belaga Estate, Sarawak, Malaysia,
4. Sabah Timora Complex Estate, Sabah, Malaysia,
5. PT. Abdi Borneo Plantation (ABP), North Kalimantan, Indonesia, and
6. PT. Tunas Borneo Plantation (TBP), North Kalimantan, Indonesia.

With the moratorium in place, GPSB is committed to suspending new planting in its 6 concessions. In the event of new planting, the moratorium will be lifted only after FPIC, High Conservation Value (HCV), and High Carbon Stock Approach (HCS) requirements are fulfilled.

4. Independent HCS Loss Assessment

The HCS loss liability period is from 1st January 2016 (the establishment of the High Carbon Stock Approach (HCSA) organization) to September 2020 (initiation of HCS liability calculation). The result of the independent High Carbon Stock area loss calculation is declared as 1,853 ha with the following details:

- | | |
|---|---------------|
| 1. Lana Estate, Sarawak, Malaysia | : None |
| 2. Jelalong Estate, Sarawak, Malaysia | : 302.98 ha |
| 3. Belaga Estate, Sarawak, Malaysia | : 31.06 ha |
| 4. Sabah Timora Complex Estate, Sabah, Malaysia | : None |
| 5. PT. Abdi Borneo Plantation (ABP), North Kalimantan, Indonesia | : 102.55 ha |
| 6. PT. Tunas Borneo Plantation (TBP), North Kalimantan, Indonesia | : 1,416.12 ha |

GPSB will compensate its HCS liability in the form of identifying and managing a conservation site, having an area greater than the declared HCS loss.

5. HCS Recovery Site

GPSB has identified and is committed to establishing a HCS Recovery Site with multiple conservation objectives in Belaga, Kapit, Sarawak, Malaysia. The extent of the site is 5,049 ha, approximately 3 times the HCS liability hectare and consists of both intact and disturbed ecosystems. GPSB will bear the cost of management and establish a legal framework to ensure long-term conservation of the site. This commitment is undertaken with the involvement and sanction of the Sarawak Forestry Department. A detailed management plan using a participatory approach will be produced for implementation by the end of 2021.

6. Stakeholder Engagement

This declaration document serves to inform stakeholders that GPSB is communicating, demonstrating transparency on matters related to new planting, conservation, and traceability, and acting on compensating for retrospective HCS liability.

Stakeholders can directly communicate with GPSB to seek clarification on its intentions. This is a positive demonstration of committing to NDPE requirements and stakeholder needs.

A handwritten signature in black ink, appearing to be 'L. Chia', is positioned above the printed name 'LAWRENCE CHIA'.

LAWRENCE CHIA

CHIEF EXECUTIVE OFFICER