

# GLENEALY PLANTATIONS SDN BHD

## No Deforestation, No Peat, No Exploitation Policy

### Introduction

Glenealy Plantations Sdn Bhd (GPSB) has recognized the importance of committing to core sustainable values in our palm oil production operations. Our commitment aims to transform our company into a responsible grower and miller in the palm oil industry, adhering to the following:

- Transparency
- No Deforestation
- No Peat
- No Exploitation

### Scope

This policy applies to all oil palm plantations and palm oil mills managed and owned by Glenealy Plantations Sdn. Bhd. Our commitment to No Deforestation, No Peat, No Exploitation (NDPE) also applies to all our third-party Fresh Fruit Bunches (FFB) supply base.

### Transparency

Transparency is the main thread flowing through our commitment to the NDPE policy. GPSB is geared to being open on matters related to new planting, conservation, and traceability. Commercially sensitive information that could prejudice GPSB's commercial interest will always remain confidential under all circumstances. The elements of transparency will be implemented through active communication with relevant stakeholders and reporting.

### No Deforestation

- In all new development areas GPSB commits to undertake the Integrated High Conservation Value (HCV) – High Carbon Stock Approach (HCSA) Assessment to identify areas having globally recognised HCV and HCS attributes. The identification procedure will be guided by the HCVRN Common Guidance and HCSA Toolkits. As such, there will be no future development in any HCV and HCS areas identified. The HCV and HCS areas identified will be protected and managed, contributing to global conservation efforts.
- In existing plantations, it will be ensured that all remnant potential HCV areas are identified and protected. This will also be ensured during replanting.
- GPSB has never subscribed to open burning for land preparation and will continue to ensure that its 'No Open Burning' policy is adhered to in any new development or replanting.
- GPSB will identify all sources of Greenhouse Gas Emissions in our mills and plantations and will progressively decrease emissions to meet relevant palm oil certification standards.

## No Peat

- Currently, GPSB has no plantings on peat and commits to no new development in peat areas of any depth. The definition of peat will follow the RSPO Manual on Best Management Practices (BMPs) on peat.
- If any existing oil palm developed on peat prior to 31<sup>st</sup> December 2015 were to come under the GPSB management in the future, these areas will be managed following RSPO BMPs for existing oil palm cultivation on peat. The prevention of peat degradation and subsidence will be a key focus.
- Replanting on peat will also follow the requirements of the RSPO BMPs on peat.

## No Exploitation

We are committed to upholding the Universal Declaration of Human Rights by the United Nations. The important Articles in this Declaration that are relevant to GPSB are:

- In new development areas, open and continuous consultations with local communities is a priority. No development will proceed without the Free, Prior, and Informed Consent of landowners and users with legal rights.
- Any land conflict and grievance raised by local communities will be resolved through a functional unbiased grievance mechanism. All appropriate grievance documentation will be made available to relevant stakeholders as a commitment to transparency.

For new and existing plantations, GPSB is committed to the following:

- Prohibition of child labour.
- Prohibition of human trafficking and the use of forced or bonded labour.
- No discrimination based on race, colour, sex, language, religion, political, national or social origin, and birth or other status.
- No tolerance of violence, harassment, and sexual exploitation.
- Gender equality and recognition of women's reproductive rights.
- Freedom of association and right to collective bargaining.
- Freedom of speech.
- Equal opportunities and ethical hiring.
- Secure and safe working environment (Occupational Safety and Health).
- Legal employment with fair wages, benefits including the right to medical treatment and insurance, following national laws and legal requirements.
- Functional grievance mechanism.

## Supply Chain

Inclusion of smallholders.

GPSB is committed to include smallholders in the FFB supply base and ensure that the relevant components of this NDPE policy is adhered to

Acknowledging that situations are not static, GPSB recognizes the need to review and upgrade this policy to comply with changing demands and requirements in the palm oil industry, when necessary.