

STATEMENT OF COMPLIANCE

for

Golden Borneo Palm Sdn. Bhd.

201501008382 (1133717-V)

TB 8283, Lot 20C, Perdana Square Commercial Centre, Mile 3 ½, Apas Road, 91000 Tawau, Sabah, Malaysia.

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Golden Borneo Palm has demonstrated compliance with the Sabah Timber Legality Standard (Sabah TLAS P1-4 Nov 2013) for the forest area based on the assessment conducted by Global Forestry Services (GFS) in **January 2024** reported in document # GFSSBH 003-238. This statement defines compliance with the due diligence requirements for legal compliance to the local Sabah Standard established as part of the current FLEGT VPA negotiations. The material harvested from this FMU is classified as Verified Legal (VL).

Product Schedule: Tree plantation and forestry management agreement

Legal Status: Verified Legal

Origin of Material: Sabah, Malaysia.

The validity of this Statement will be dependent upon the ability of **Golden Borneo Palm** to demonstrate continual compliance with the Sabah Timber Legality Standard as monitored by GFS. GFS shall post a summary legal verification report and compliance statement on the GFS client database (www.gfsinc.biz).

GLOBAL FORESTRY SERVICES LEGAL VERIFICATION SERVICES

Audit Statement # : GFS 055 LVS
Issuance Date : 22 January 2024
Expiration Date : 21 January 2025

Global Forestry Services



Kevin T. Grace PhD
Director

The assessment, on which this statement is based, was made in good faith by evaluating representative samples of the organization's operations and activities in relation to the standards for Legality as defined by the Sabah TLAS Standard P1-4. This document does not constitute any representation to the quality of any products sold by the named organisations and Global Forestry Services accepts no liability in respect thereof. This statement remains the property of Global Forestry Services and must be returned upon request.

Document Control

GFS-FORM-006-SABAH TLAS-2.3	Title: Audit Statement Sabah TLAS P1-4	Issue: 04	Date: 18 Jul 2022
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LICENSED AREAS

for

Golden Borneo Palm Sdn. Bhd.

201501008382 (1133717-V)

Signed License Agreement / Form IIB: Land Title (Title Registration # and Date):

Benta Wawasan signed a Tree Plantation and Forestry Management Agreement JP(TKA)122/96(CO) to develop plantations. Benta Wawasan assigned Rakyat Berjaya, which subcontracted Golden Borneo Palm to develop and manage an area of 26,764 ha located in Kalabakan and Gunung Rara Forest Reserve.

Coupe Permit # & Expiry date

The SFD issued a separate coupe for Oil palm plantation and Land preparation (salvage logging).

Firstly, a salvage logging coupe permit will be issued on the area allowing salvage logging to be conducted and subsequently, another coupe permit will be issued for the purpose of oil palm plantation after the completion of salvage logging.

A closing coupe inspection is carried out after the salvage logging activity is completed.

However, the ITP coupe area has remained a single couped issue.

Oil palm plantation development coupe.

Coupe Permit #	Block	Expiry	Area (ha)
TWU.10/17	BW.9/99	01/11/2092	5,178.65
TWU.05/16	BW.11/02	02/01/2092	2,089.48
TWU.01/2020	BW11/01	16/01/2095	2,106.61
TWU.02/2020	BW9/01	08/03/2095	2,634.13
TWU.04/12	BW.9/00	16/04/2042	2,118.58
TWU.03/2020	BW11/00	08/03/2095	2,058.72
TWU.03/2022	BW09/03(A)	23/04/2096	1,125.10
TWU.06/2023	BW09/03(B)	23/04/2096	1,309.57
		Total	18,620.84

ITP coupe.

Coupe Permit #	Block	Expiry	Area (ha)
TWU.06/15		05/01/2091	256.00

Salvage logging coupe.

Coupe permit	Block	Expiry	Area (ha)
TWU.02/2022	BW9/02	12/04/2027	4,175.74
TWU.06/2020	BW09/03	*	*
TWU.05/2021	BW9/00	07/04/2026	3,876.56

*Salvage logging has been completed.

Coupe permits issued have identified and mapped the areas for protection (i.e., steep areas, buffer zones, riparian reserves).

However, the protected areas defined in the coupe permit differ from the EIA protection map.

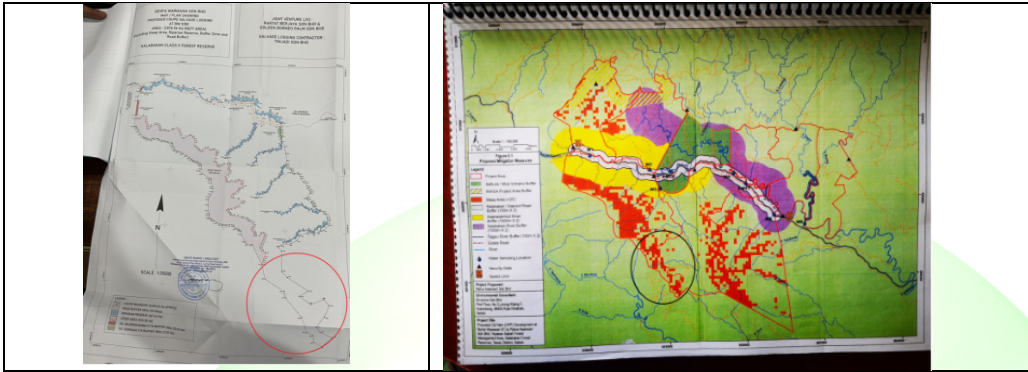
Sample of steep area mapped differs between coupe permit vs. the EIA (see circled).

Sample of coupe permit map	EIA protection map
Block9/00	Red box coloured is defined as steep area

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Golden Borneo Palm has submitted a notification letter (Ref.#: GBPSB/EPD/0002/1223 dated 18/12/2023) and acknowledged receipt by the EPD, highlighting discrepancies in the mapped steep areas between the coupe permit and the EIA. Currently, Golden Borneo Palm is pending feedback from the EPD. The company has identified steep areas as protected from operations.

January 2024: Gap 001/2024 (minor)

Areas identified for protection in the EIA should also be identified in the coupe permit to support operational compliance.

**Form IIB Permit
Not applicable**



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