

Sabah TLAS Audit Report Principles 5 & 6

Organisation	Uni-Lumber Sdn. Bhd. 199601012704 (385054-D)	Reference #	GFSSBH 004-862
Contact Person	Mr. Francis Loo – Management Representative Ms. Jessica Soon – Marketing Manager	Audit Date	04/08/2025
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		Approved By	Dr. Kevin Grace

Statements

Statement of Compliance	GFS 233 WTP		
Issuance Date	11 August 2025	Expiration Date	10 August 2026

Assessment Details

Company Type	Exporter, Importer
Scope of Assessment	Sabah TLAS P5-6: FDS(TW)(S)004/2019, FDS(KK)(E)102/2019, FDS(KK)(I)032/2019
Product Group	Sawn timber
Source of Material	Sabah, Malaysia.
Species	Shorea spp. (Red seraya, Yellow seraya), Shorea inappendiculate (Selangan batu), Dipterocarpus spp. (Keruing), Dryobalanops spp. (Kapur), Shorea pauciflora (Oba Suluk), Lithocarpus sp. (Mempening), Dialium spp. (KerANJI), Spondias dulcis (Kedondong), Hopea sangal (Gagil), Koompassia malaccensis (Kempas), Cotylebium melanoxyton (Resak Batu)
Lead Assessor	Anne Gimbir
Assessor(s)	Sam Shamsul
SFD Staff	De-Almeida G. Yukong (ADFO KK), Jepri Brahim (PPD KK)

Terms of Assessment

The scope of the evaluation is to verify compliance with Uni-Lumber Sdn. Bhd. to the criteria within the Sabah Timber Legality Assurance System (TLAS) Principle 5 - Mill Operations and Principle 6 - Trade and Customs standards. Compliance is defined when the organization demonstrates that there is no non-compliance to any applicable criteria. Non-compliance to the Sabah Legality Standard occurs when the organization does not comply with 1 or more criteria. Non-compliance must be formally addressed prior to certification or within 2 months following a surveillance assessment

Limitations of Assessment

The information presented in this report is based on documentation and other information presented by the client and observations made during the field verification under the assessment. Auditor's reporting of information presented by the client are taken as accurate, unless evaluated differently through the observations made during the assessment. All information presented in the report is accurate and complete to the best of knowledge of GFS.

Background Information:

Uni-Lumber Sdn. Bhd. (Uni-Lumber) is, on and from the 24/04/1996, incorporated under the Companies Act 1965, in Tawau, Sabah, Malaysia with registration number 199601012704 (385054-D). Uni-Lumber has a certificate under FSC with Certificate #: SGSHK-COC-450015 (FSC-C124512), expiry date of 24/02/2030 and a COC-Multisite under the PEFC with certificate #: SGSMTY-PEFC-COC-0127 (SGS-MTCS/COC-0127), expiry date of 06/12/2026.

Uni-Lumber is an importer and exporter with no processing facilities. Uni-Lumber purchased round logs locally and has not imported logs or purchased raw material. The logs were directly shipped to its associated companies, Irama Ramai, Gold Rank and KD's provider, Carl Ronnow Logistics for processing materials. The finished goods were directly shipped from the associated companies to the local buyers and buyers in Europe (Belgium and the Netherlands).

The previous assessment was conducted in August 2024 that resulted in 3 gap(s) and 1 observation(s) (Report #: GFSSBH 004-712).

Associated Organizations & Subcontractors:

Uni-Lumber owns Irama Ramai Sdn. Bhd. (Irama Ramai) located in Keningau and Gold Rank Sdn. Bhd. located in Tawau. RM Services to handle the export & import documentation.

Description of the Supply Chain:

From August 2024 to July 2025, Uni-Lumber purchased raw materials from the suppliers as below.

Company	License	Raw Material	Location	GFS WTP # STCC #	Overall Risk *
Bornion Timber Sdn. Bhd.	SFMLA 03/97	Round logs	Sook	GFS 054 LVS (27/10/2025)	Low
Gold Rank Sdn. Bhd.	JP(T)TW001/10(X04)	Sawn timber	Tawau	GFS 010 WTP (23/02/2026)	Low
Twin Firm Sdn. Bhd. (Brilliant Junction Sdn. Bhd.)	JP(NKG)001/2023(F1)	Round logs	Keningau	-	High
Pesona Majukaya Sdn. Bhd.	SFMLA 01/2018	Round logs	Serudong	GFS 163 LVS (08/06/2026)	Low
TSH Resources Berhad	SFMLA 07/97	Round logs	Beluran	GFS 064 LVS (17/11/2025)	Low
KTS Plantation Sdn. Bhd.	JP(SLK)125/93(CO)	Round logs	Sandakan	Non-Compliance	High

*GFS risk evaluation is based on the risk matrix for Sabah TLAS (VL) materials & products.

Summary Results:

(Major gap = 0, Minor gap = 0, Observation = 0)

GAPs: Year 2025				
GAP #	Type	Checklist	Status	Description
001/2024	minor	5.2.4	Closed	August 2024: Removal Passes were not consistently stamped as "Used" by the SFD. August 2025: Removal Passes were consistently stamped as "Used" by the SFD.
002/2024	minor	5.3.1 5.3.2	Closed	August 2024: Workers have no employment agreement. August 2025: Workers have employment agreement.
003/2024	minor	5.3.5	Closed	August 2024: Inconsistent in contributing SOCSO and EPF for workers. August 2025:

				Workers were contributed SOCSO and EPF monthly.
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*Major = Non-Compliance

Observations: Year 2025		
Obs #	Checklist	Description
001-2024 Addressed	6.3.5 6.3.6	<p>August 2024: SFD and Uni-Lumber have yet to implement the Sabah TLAS EUDR to include geo-location.</p> <p>August 2025: EU has delayed implementation of EUDR to 2026.</p>

Highlights of Close-Out Visit (if applicable)	Date: -
Not applicable	

Recommendations
<p>Uni-Lumber Sdn. Bhd. has demonstrated compliance with the Sabah Standard Principles 5-6 for Chain of Custody and is recommended to receive a GFS Statement of Compliance and Sabah Timber Legality Assurance System Compliance Certificate (TLAS-CC) from SFD.</p> <p>The next surveillance visit is scheduled for August 2026.</p>

End of Summary Report