Particulars

About Your Organisation

1.1 Name of your organisation
UBS AG
1.2 What is/are the primary activity(ies) or product(s) of your organisation?
Palm Oil Grower
Processor and/or Trader
Consumer Goods Manufacturer
Retailer
Bank and/or Investor
Social and/or Development NGO
Environmental and/or Conservation NGO
Affiliate
1.3 Membership number
5-0014-11-000-00
1.4 Membership category
Banks and Investors
1.5 Membership sector
Ordinary

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1.1 opt	Please state your company's main activity(ies) within palm oil-related financing. Please select all applicable ion(s).
~	Corporate / Commercial Banking
Y	Trade Finance
Y	Private Banking
Y	Investment / Equity
\checkmark	Debt / Capital Market
	Other
Oth	ner
-	
2. O _j	perations in Palm Oil
2.1	What types of financial services does your company provide to the palm oil industry?
\mathbf{V}	Trade Solutions
\mathbf{V}	Lending/Loans
	Leasing
	Treasury Products
	Cash Management Products
\mathbf{Y}	Investments
	Insurance
	Other
Oth	ner
-	
2.2	For your company's palm oil-related activities, which geographic region(s) do you operate in?
\checkmark	Worldwide
	Africa
	Europe
	North America
	South America
	Middle East
	China
	India
	Indonesia
	Malaysia
	Oceania
	Rest of Asia

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	Policy and Progress
	ur company have a lending or investment policy on palm oil?
Yes	
3.2 Which s	upply chain sectors does your palm oil policy cover?
✓ Growers	
✓ Traders	
✓ Processors	
Consumer (Goods Manufacturers
Retailers	
Others	
Others	
3.3 Does you products, an	ur policy on palm oil make a specific reference to RSPO-certified sustainable palm oil and oil palm ad/or RSPO certification?
Yes	
3.4 Does yo	ur company have a policy that requires all your palm oil clients to be RSPO members?
Yes	
uptake?	
3.6 When do	you expect to require all your Grower clients to be RSPO certified?
2020	
3.7 When do 2030	you expect to require your clients in all other sectors to be RSPO certified?
	egions do the above commitments cover?
✓ Worldwide	
Africa	
Europe	wice.
North Ame	
South Amer	
Middle East	
China India	
India	
Malaysia	
Oceania	
Comma	

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3.9 What measures do you take if a client is not meeting the requirements of your policy on palm oil?

We will only work with clients who are RSPO members. In case a new client is not meeting our requirements, we engage with them to understand their willingness, capacity and resources to become RSPO members (if not already) with a credible plan for full certification. If the client is committed to obtaining full RSPO certification, we would then incorporate relevant contract clauses and corrective action plan in loan documentation and contractual agreements. If the client does not show willingness or is unable to comply with our requirements we will not enter the relationship.

3.10 Do you proactively engage with your clients to support and join the RSPO?	
Yes	
3.11 Did members of your company participate in RSPO working groups and/or taskforces during the reporting period?	
Yes	
3.12 Does your company have any collaborations with public or private sector palm oil industry players to support them in their efforts to increase the production or consumption of certified sustainable palm oil (CSPO)?	
No	

3.13 What other activities have your company undertaken to promote RSPO-certified sustainable palm oil and oil palm products during the reporting period?

Member of RSPO's Financial Institutions Task Force to increase engagement with financial institutions (non-members) & attract more members from the Financial Institutions community - Member of the RSPO's Complaints Panel - Continuous work with and on the Banking Environment Initiative's and the Consumer Goods Forum's 'Soft Commodities' Compact. The Compact clearly references the RSPO as the relevant certification scheme in the palm oil industry to support the goal of 'zero net deforestation' by 2020 - UBS applies a requirement for palm oil companies to be committed to 'No Deforestation, No Peat and No Exploitation' (NDPE), which is increasingly being adopted in the palm oil sector

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4. Actions for Next Reporting Period

 $4.1\ Please\ outline\ activities\ that\ your\ company\ will\ take\ in\ the\ coming\ year\ to\ promote\ the\ production\ or\ consumption\ of\ certified\ sustainable\ palm\ oil\ (CSPO)$

-Encourage regional banks in palm oil producing countries to join RSPO; -Further strengthen our engagement with RSPO and peers; and -Foster exchange with other Financial Institutions and corporations on palm oil topic

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5. Shared Responsibility

Compensation

Yes

The Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules or email the ACOP team at acop@rspo.org

acop@rspo.org
Labour & Labour Rights
5.1 Does your company have a publicly-available policy covering Labour & Labour Rights?
Yes
5.1.1 Does the policy cover:
✓ No discrimination ✓ Wage and working conditions
✓ Freedom of association
No child labour
✓ No harassment
✓ No forced or trafficked labour
5.1.2 Has your company previously uploaded or linked its Labour & Labour Rights policy in previous ACOP reporting cycles?
Yes
Ethical Conduct & Human Rights
5.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?
Yes
5.2.1 Does the policy cover:
5.2.1 Does the policy cover: ✓ Recruitment
Recruitment Contractors
Recruitment
Recruitment Contractors
Recruitment Contractors Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC
Recruitment Contractors Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC reporting cycles?
Recruitment Contractors Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC
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 ✓ Recruitment ✓ Contractors ✓ Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC reporting cycles? Yes Land Use
Recruitment Contractors Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC reporting cycles? Yes
 ✓ Recruitment ✓ Contractors ✓ Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC reporting cycles? Yes Land Use
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Recruitment Contractors Sub-Contractors & Third-Party Contractors 5.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACC reporting cycles? Yes Land Use 5.3 Does your company have a publicly-available Policy covering Land Use?

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5.3.2 Has your company previously uploaded or linked its Land Use policy in previous ACOP reporting cycles?

Occupational Health & Safety
5.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?
Yes
5.4.1 Has your company previously uploaded or linked its Occupational Health & Safety policy in previous ACOP reporting cycles?
No
Climate Change & Greenhouse Gas (GHG)
· · ·
5.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?
Yes
5.5.1 Does the policy cover:
✓ Identification and assessment of GHG
Public reporting of GHG footprint
Monitored implementation plan to reduce or minimise CHG emissions
5.5.2 Has your company previously uploaded or linked its Climate Change & Greenhouse Gas policy or report in previous ACOP reporting cycles?
No
Complaints & Grievances
5.6 Does your company have a Complaints & Grievances Mechanism?
Yes
5.6.1 Is your Complaints & Grievances mechanism in line with the RSPO's grievance mechanism? For details of the RSPO's grievance mechanism, please go to https://askrspo.force.com/Complaint/s/
No
Smallholders
5.7 Does your company support oil palm independent smallholder groups?
No
5.7.3 Do you have any future plans to support oil palm Independent Smallholders?
No
5.7.4 Please explain why you are not planning to support oil palm independent smallholders

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Given our client base we will only work with RSPO members

6. Challenges

6.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
Awareness of RSPO in the market
Difficulties in the certification process
Certification of smallholders
Competition with non-RSPO members
High costs in achieving or adhering to certification
Human rights issues
Insufficient demand for RSPO-certified palm oil
Lowusage of palm oil
Reputation of palm oil in the market
Reputation of RSPO in the market
Supply issues
Traceability issues
No challenges faced
✓ Others
Others
- UBS may be losing business to banks that do not have similarly stringent RSPO requirements - Availability of reliable data on companies' overall sustainability performance/ compliance with RSPO efforts.
6.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?
•
Engagement with business partners or consumers on the use of CSPO
Engagement with business partners or consumers on the use of CSPO
Engagement with business partners or consumers on the use of CSPO Engagement with government agencies
Engagement with business partners or consumers on the use of CSPO Engagement with government agencies Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
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Engagement with business partners or consumers on the use of CSPO Engagement with government agencies Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations Promotion of physical CSPO Providing funding or support for CSPO development efforts Research & Development support Sakeholder engagement No actions taken ✓ Others Others As outlined above UBS will continue to apply an environmental & social risk framework to all transactions, products, services and activities in order to identify and assess potential environmental and social issues and to manage any identified risks. As part of this process, UBS will engage with clients and suppliers in order to understand their processes and policies and to explore how environmental and social risks may be mitigated. UBS is involved in initiatives to promote sustainable palm oil including: - Working on the implementation of the BEI/CGF 'Soft Commodities Compact', and - Regular engagement with global peer banks through the RSPO Financial Institution Task Force group. 6.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here ESR Policy Framework https://www.ubs.com/global/en/ubs-society/our-
Engagement with business partners or consumers on the use of CSPO Engagement with government agencies Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations Promotion of physical CSPO Providing funding or support for CSPO development efforts Research & Development support Sakeholder engagement No actions taken Others Others Others As outlined above UBS will continue to apply an environmental & social risk framework to all transactions, products, services and activities in order to identify and assess potential environmental and social issues and to manage any identified risks. As part of this process, UBS will engage with clients and suppliers in order to understand their processes and policies and to explore how environmental and social risks may be mitigated. UBS is involved in initiatives to promote sustainable palm oil including: - Working on the implementation of the BEI/CGF 'Soft Commodities Compact', and - Regular engagement with global peer banks through the RSPO Financial Institution Task Force group.

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