

Introduction

ASR Group International, Inc. and its subsidiaries (collectively, “*ASR Group*”) are committed to ensuring the protection and preservation of human rights in our operations, and we require the same commitment from our contractors, suppliers and other business associates (collectively, “*Stakeholders*”).

As a sugarcane company and the world’s largest cane sugar refiner, ASR Group takes our social responsibilities seriously. Ensuring the sustainability of our operations, our supply chain and our products is one of ASR Group’s core values, and respecting human rights is fundamental to that goal. These principles drive us to continually strengthen our global Corporate Social Responsibility (CSR) efforts so that we can have a positive impact on human rights.

Our Commitment

ASR Group recognizes that we have a responsibility to address any adverse human rights impact that may be present in our operations and to use our leverage to encourage our Stakeholders to respect human rights in our extended supply chain.

ASR Group respects and promotes all fundamental human rights outlined in the United Nations’ (UN) International Bill of Human Rights and the International Labor Organization’s (ILO) Core Conventions, as set forth in the Declaration of Fundamental Principles & Rights at Work. ASR Group is also committed to conducting ongoing human rights due diligence in line with the UN’s Guiding Principles on Business & Human Rights and to follow the Organization for Economic Cooperation & Development’s (OECD) Due Diligence Guidance for Responsible Business Conduct.

Sourcing raw cane sugar for refining is at the heart of our business. We purchase raw cane sugar from suppliers around the world, including from certain developing countries that face widespread poverty, low education levels, and little to no social support for their vulnerable populations. ASR Group recognizes that sourcing sugar from companies in developing countries brings specific risks and responsibilities, because the laws and regulations of sovereign states are sometimes insufficient to ensure compliance with international human rights principles. In evaluating our suppliers in such instances, ASR Group relies on internationally recognized social responsibility and environmental sustainability standards such as ProTerra or Bonsucro to ensure compliance with fundamental human rights.

Oversight and Accountability

Human rights oversight is the responsibility of ASR Group’s Legal, Corporate Social Responsibility (CSR), Human Resources, Corporate Affairs, Compliance and Internal Audit Departments. The Vice Presidents of each of these departments report to ASR

Group's Co-Presidents and the Board of Directors. ASR Group's Vice President & General Counsel oversees the CSR Department and also reports to ASR Group's Co-Presidents and the Board of Directors. An annual briefing on matters related to human rights is presented to ASR Group's Executive Committee and the Board of Directors and additional discussions are held at their meetings as needed.

ASR Group's Co-Presidents, with the aid of their senior leadership team, execute strategic planning and decision-making in line with the ASR Group's established mission and values and in keeping with the vision established by the Board of Directors.

Assessment

ASR Group's due-diligence process actively ensures compliance with human rights standards in our supply chain. ASR Group's CSR, Sustainability and Risk Management Departments regularly perform a risk analysis and evaluation of our supply chains, business practices and outcomes that includes feedback from internal and external stakeholders

Regarding the raw sugar supply chain, ASR Group has established a four-step process to verify our suppliers:

- Step 1** Suppliers are required to adhere to ASR Group's Supplier Code of Conduct, which is based on internationally recognized standards.
- Step 2** Suppliers are requested to complete annual self-assessments of their social and ethical practices using the Sedex Supplier Engagement platform, which includes compliance with labor, health, safety, environmental and business integrity standards.
- Step 3** Certain suppliers are requested to participate in independent sustainability audits based on social and environmental sustainability standards. Those standards include SMETA, ProTerra, Bonsucro and other globally recognized standards.
- Step 4** Suppliers are encouraged to improve in areas of non-compliance, and ASR Group supports suppliers with those efforts.

Additionally, a number of suppliers from which ASR Group sources raw sugar are Fairtrade certified. Fairtrade certification is based on regular audits of smallholder operations against the Fairtrade standard that prohibits forced labor, slavery and human trafficking.

Regarding the rest of ASR Group's supply chain, we require potentially at-risk Stakeholders to participate in an independent social audit against an internationally recognized social standard.

Findings and Remediation Programs

ASR Group's CSR efforts provide us with tools not only to assess our supply chains, but also to identify what is a potentially significant concern, evaluate its potential effect, and obtain ongoing feedback from all Stakeholders involved. This approach allows ASR Group to focus our remediation efforts on priority areas. ASR Group works with our supply chains to find solutions to issues by using in-house and third-party expertise, including International Finance Institutions (IFIs), NGOs, and remediation partnerships with customers. The common objective of all these entities is to achieve a sustainable supply chain that ensures compliance with fundamental human rights.

Reporting Mechanism

ASR Group maintains communications channels for internal and external Stakeholders. Employees can submit grievances via ASR Group's Ethics Hotlines and external Stakeholders may file objections via a web-based email mechanism to ensure access to a transparent, protected and confidential investigative tool for the complaints of the parties concerned. ASR Group's Ethics Hotlines are toll-free telephone numbers managed by a third-party to provide employees a method of communicating concerns and to protect their identity to the greatest extent possible.

Future Reporting

ASR Group will provide an annual update on our efforts to preserve and promote respect for human rights in our supply chain.