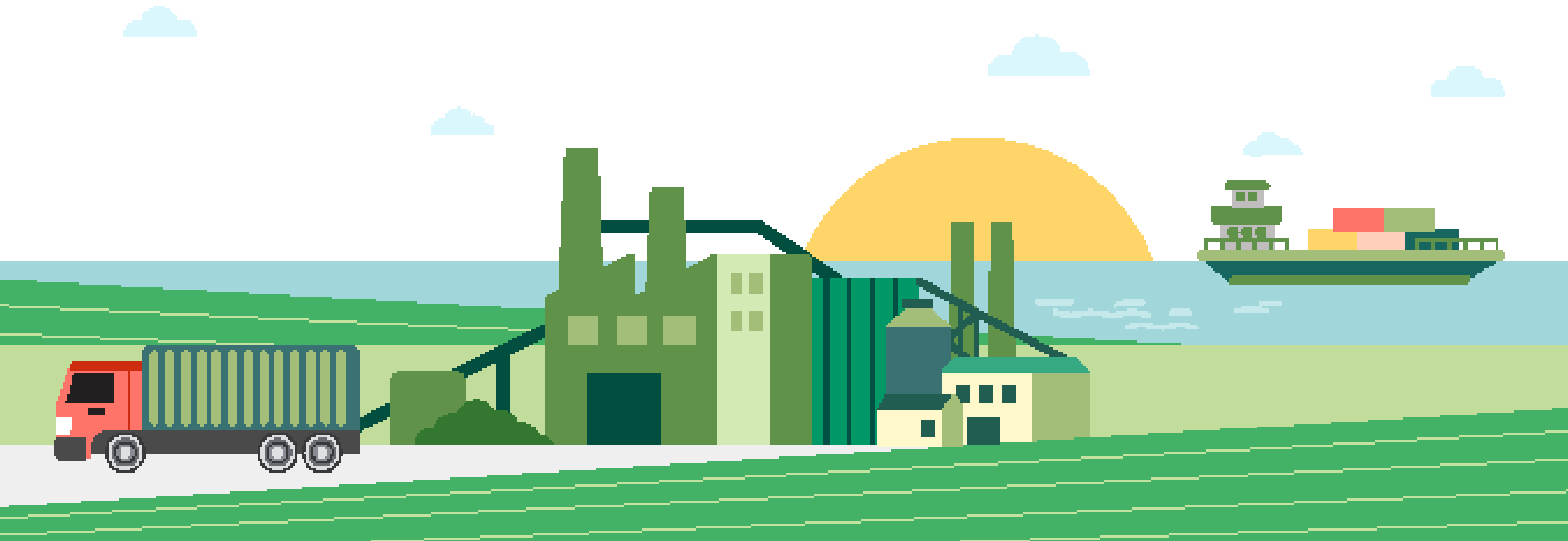
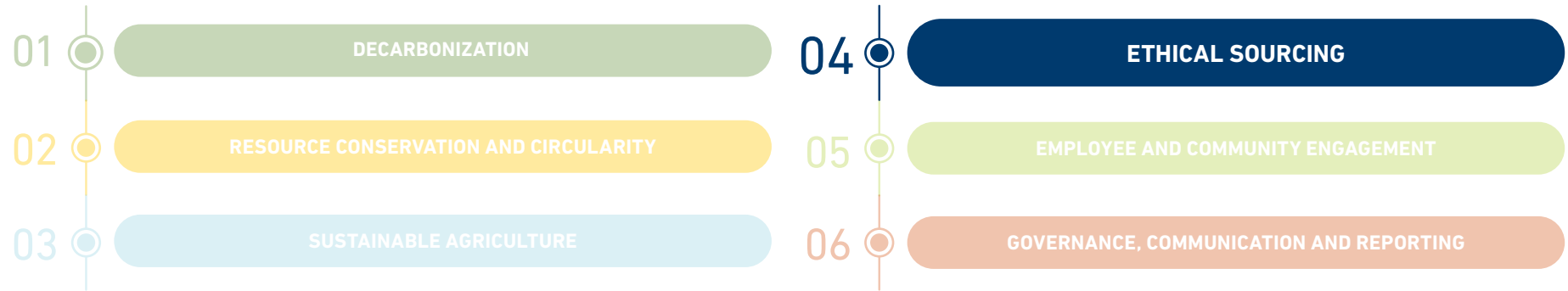




SUSTAINABILITY FOCUS AREAS





ETHICAL SOURCING – ASR GROUP SOURCING PROGRAM

The ASR Group® family of companies (“ASR Group”) is committed to building a resilient, transparent, and ethical supply chain that supports sustainable agriculture and responsible sourcing. Via the ASR Group Sourcing Program, we aim to partner with suppliers who share our values and uphold rigorous standards for labor, environmental stewardship, and traceability. Through continuous engagement, data-driven assessments, and collaboration, we aim to ensure that every link in our supply chain contributes to a more sustainable future.

OUR SOURCING PROGRAM

Goals and Long-Term Targets

Our goals embed sustainability into our ethical sourcing strategy, supported by measurable targets that drive accountability and continuous improvement across our global supply chain. ASR Group aims to:



- Source **95%** of raw sugar by using third-party CSR assessment tools by 2035.



- Expand CSR efforts beyond raw sugar to other supply chains.



- Target **100%** supplier participation in Sedex (SAQ).



- Achieve full mill-level transparency across sourcing regions.



- Resolve **30%** of prior FY audited non-compliances.

To support these objectives, through the ASR Group Sourcing Program, we have established clear sourcing principles and robust third-party validation processes (certification and verification against internationally recognized social standards).

Framework for Ethical Sourcing

Our approach aligns with internationally recognized standards and is supported by policies that set clear expectations for suppliers and internal operations.

ACCOUNTABILITY MEASURES

We maintain a suite of publicly available policies to guide ethical sourcing and supplier conduct:

- Ethical Sourcing Policy
- Supplier Code of Conduct
- Code of Ethics and Business Conduct
- Human Rights Statement
- Human Trafficking Policy
- Child Labor Remediation Policy
- Deforestation Statement

These policies align with global frameworks such as the **UN Guiding Principles on Business and Human Rights** and comply with legislation including:

- U.K. Modern Slavery Act
- 1930 U.S. Tariff Act
- Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act



Social Responsibility and Advocacy

Our commitment extends beyond ethical sourcing into broader social responsibility and advocacy. We respect land rights and require suppliers to adhere to **ASR Group's Supplier Code of Conduct**, which includes provisions on respecting the land rights of local and indigenous communities, as well as grievance mechanisms designed to support free, prior, and informed consent.

Challenges in Developing Nations

While these policies and standards guide our approach, we recognize that sourcing sugar from developing countries presents unique challenges. Many of these regions face poverty, limited educational opportunities, and constrained social support systems, and the sugar industry often plays a critical role in sustaining local economies.

We are committed to ethical sourcing practices, capacity-building programs in some locations, and collaborative partnerships that promote long-term resilience and social equity.



Implementing Ethical Sourcing – ASR Group Sourcing Program

Ethical Sourcing Criteria

Our process ensures supplier compliance through:



- **Policy Adherence:** Compliance with **ASR Group's Ethical Sourcing Policy, Supplier Code of Conduct** and **UN Human Rights principles**



- **Certification & Verification via third-party audits:** Encouragement of certifications (**ProTerra, Bonsucro, Fairtrade, VIVE (claim level) and Fairtrade**)



- **Self-Assessment:** Annual self-assessment questionnaire (**SAQs**) via **Sedex**

ASR Group Sourcing Program

Via the ASR Group Sourcing we encourage third-party audits covering health, safety, labor, human rights, and environmental performance. We request suppliers to complete one of the following:

- Certification by a recognized social standard (**e.g., Bonsucro, ProTerra, VIVE (claim level), or Fairtrade**) with full chain of custody
- Third-party supplier verification audit program, using contracted services aligned with **ProTerra, Sedex SMETA 4-Pillar or VIVE standards** (gap analysis audits)
- Certification by the **Farm Sustainability Assessment (FSA)** or benchmarked standard, plus a mill audit against the **Sedex SMETA 4-Pillar**

Non-compliant suppliers must submit **Corrective Action Plans (CAPs)** with root cause analysis and completion timelines. We engage and collaborate with development finance institutions, NGOs, and customers that provide capacity-building resources to support supplier remediation.

Expanding Ethical Sourcing Beyond Raw Sugar

Since 2020, we have extended engagement to suppliers across other supply chains through participation in our third-party supplier verification audit program against the Sedex SMETA 4-Pillar standard.

We have partnered with EcoVadis to strengthen sustainability oversight across ASR Group's broader supply chain. Implementation began in FY25 with risk screening via EcoVadis IQ. High-risk suppliers are prioritized based on strategic importance

EcoVadis Tools Deployed:

- 
Ratings: Scorecards on Environment, Labor & Human Rights, Ethics, and Procurement
- 
Vitals: Continuous monitoring of risk signals
- 
Carbon Action Manager: Supports supplier GHG target-setting and tracking.

This data-driven approach informs sustainability risk management and guides targeted capacity-building. Where gaps are identified, we support corrective actions to improve supplier sustainability maturity. Outcomes will be integrated into ASR Group's procurement systems (SAP Ariba, Celonis) to support compliance with global standards (IFRS, GRI, ESRS, Modern Slavery Act).



Our Own Operations

We uphold high ethical standards across our operations, guided by policies aligned with international principles on labor rights, health and safety, environmental stewardship, and business ethics. These policies establish clear expectations for responsible practices across all ASR-owned sites.

To ensure compliance and continuous improvement, we implement robust checks and balances through annual **Sedex Members Ethical Trade Audits (SMETA)**—one of the most widely recognized social auditing protocols globally, based on the Ethical Trading Initiative's principles. Independent auditing firms conduct these audits to guarantee objectivity and transparency.

The **SMETA** process evaluates our adherence to labor rights, health and safety, environmental standards, and ethical business conduct.

Audit results are shared with customers and include:

- **Annual Compliance Reports** summarizing performance against Sedex standards
- **Corrective Action Plans (CAP)** detailing steps to address any non-compliances

This approach reinforces our commitment to ethical operations and provides accountability through third-party verification.



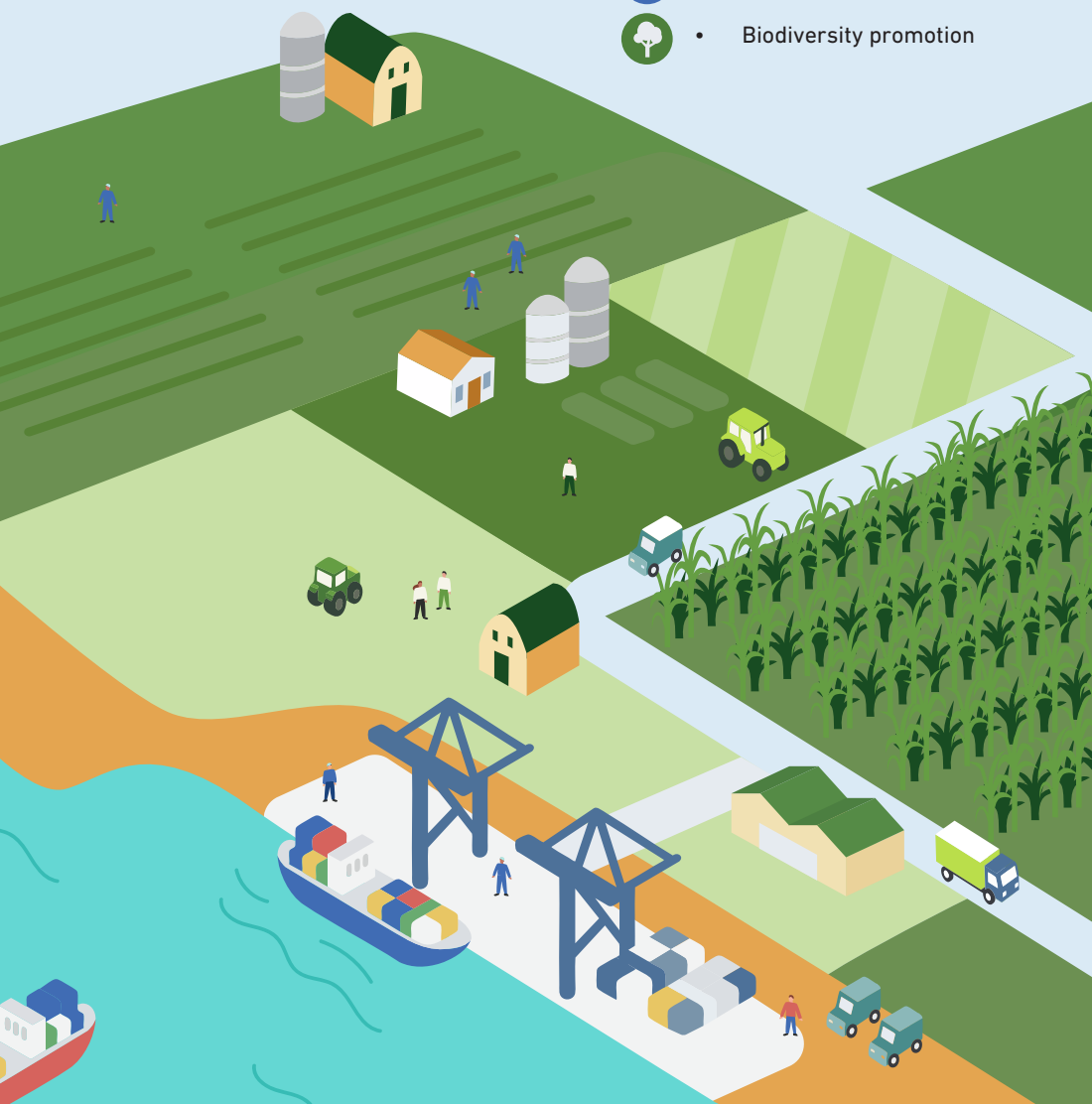
1. IFRS - International Financial Reporting Standards
 2. GRI - Global Reporting Initiative
 3. ESRS - European Sustainability Reporting Standards

Fairtrade & Community Support

ASR Group supports smallholder cane farmers through Fairtrade certification, enabling democratic decision-making and community reinvestment.

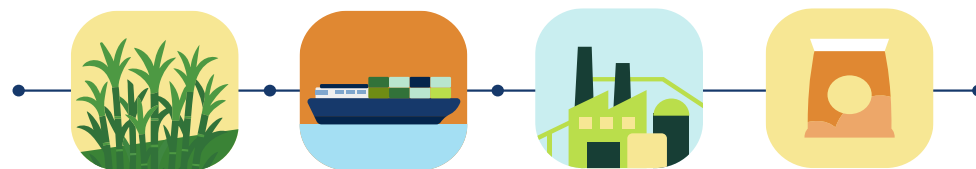
Fairtrade Premiums Fund:

-  • On-farm productivity improvements
-  • Women and youth development
-  • Worker health and safety
-  • Child labor prevention
-  • Biodiversity promotion



Traceability & Data Integration

ASR Group is committed to transparent sourcing and alignment with leading sustainability reporting standards, including **IFRS**¹, **GRI**², and **ESRS**³, while complying with applicable U.S., U.K., Canadian, and EU trade regulations.



Advocacy and Partnerships

We collaborate with customers, NGOs, trading houses, financial institutions (**e.g., Inter-American Development Bank**), and partners in renewable energy and climate-smart agriculture.

ASR Group remains committed to leading with integrity and transparency, building a supply chain that meets today's standards while setting benchmarks for the future. This commitment to ethical and responsible sourcing guides our partnerships, shapes our expectations for suppliers, and supports our long-term goal of contributing to a more sustainable and equitable global supply network.

¹ International Financial Reporting Standards (IFRS)

² Global Reporting Initiative (GRI)

³ European Sustainability Reporting Standards