

Introduction

ASR Group is committed to understanding the health, safety, environmental, labor, and human rights issues associated with our supply chains. This Ethical Sourcing Policy applies to ASR Group International, Inc. and all of its direct and indirect subsidiaries (collectively, “ASR Group”).

“Supplier” refers to an individual or entity that supplies goods or performs services for or on behalf of ASR Group, including vendors, contractors, consultants, agents, brokers, intermediaries, introducers, agents, and other third parties.

Policy and Practice

ASR Group’s policy is to purchase goods and services that:

- are produced and delivered under conditions that uphold fundamental human rights;
- do not involve the abuse or exploitation of any persons;
- are grown, produced, manufactured and sold in accordance with the applicable laws; and
- minimize adverse impacts on the environment.

ASR Group’s practice is to:

- require that its Suppliers adhere to ASR Group’s Supplier Code of Conduct (the “Code”) (Attachment A);
- require each Supplier to certify that it is, and shall remain during the term of the applicable agreement, in compliance with the Standards contained in the Code;
- reserve the right to assess a Supplier’s compliance with the Code and require a corporate social responsibility compliance assessment; and
- if a Supplier’s practices are found not to be compliant with the Code, work collaboratively with the Supplier to remediate any non-compliances in a timely manner to the extent commercially reasonable.

Additional information regarding ASR Group’s commitment to corporate social responsibility and sustainability is available at www.asr-group.com.

Enforcement

If practices are found not to be compliant with the Code, Suppliers are expected to act promptly to propose and implement improvements to achieve compliance. Where Suppliers are unwilling or unable to meet the requirements of the Code or where Suppliers refuse to participate in corporate social responsibility compliance assessments, ASR Group is prepared to terminate contracts with such Suppliers.

SUPPLIER CODE OF CONDUCT



Introduction

ASR Group is committed to understanding the health, safety, environmental, labor, and human rights issues associated with our supply chains. This Supplier Code of Conduct (“Code”) applies to all Suppliers¹ of ASR Group International, Inc. and all of its direct and indirect subsidiaries (collectively, “ASR Group”). For additional information regarding ASR Group’s commitment to corporate social responsibility and sustainability, please refer to our website (www.asr-group.com).

For the purpose of this Code, a “Supplier” is an individual or entity that supplies goods or performs services for or on behalf of ASR Group. It includes, but is not limited to, vendors, contractors, consultants, brokers, intermediaries, introducers, agents and other third parties.

Standards

We understand that local customs, business practices and conditions may vary, but we strive to uphold our core values and ethical principles wherever we operate. For that reason, we expect our Suppliers to respect fundamental human rights and the environment in which they operate. At a minimum, we require that all Suppliers and their facilities meet the requirements stated below (“Standards”), which are intended to meet ASR Group’s commitment to all aspects of corporate social responsibility and sustainability:

- **Compliance with Laws & Regulations.** Suppliers shall grow, produce and manufacture products and provide services in accordance with applicable local laws and regulations (“Applicable Law”).
- **Child Labor.** Suppliers shall comply with all Applicable Law regarding child labor. Suppliers shall neither employ anyone under the minimum age or whose employment would interfere with compulsory schooling, nor allow any employee under 18 to undertake any work likely to jeopardize their physical or mental health, safety or morals.
- **Human Rights.** Suppliers shall conduct business in a manner that does not involve the abuse or exploitation of any persons and shall respect fundamental human rights as set forth in The United Nations Universal Declaration of Human Rights.
- **Working Hours, Salaries and Wages.** Suppliers shall comply with all Applicable Law regarding forced, bonded or involuntary labor, slavery and human trafficking, wages, benefits, work hours, and employee rights to freedom of association.

¹ This Code does not create any rights or third party benefits for Supplier, its supply chain, their respective employees, or any other person or entity.

- **Health & Safety.** Suppliers shall comply with all Applicable Law regarding health and safety and provide employees with a safe and sanitary workplace that includes appropriate training, protective equipment and controls.
- **Environment.** Suppliers shall comply with all Applicable Law concerning the environment, and seek to minimize and mitigate adverse impacts to the environment, including impacts to air, water, soil and surrounding areas.
- **Non-discrimination & Harassment.** Suppliers shall comply with all Applicable Law regarding non-discrimination, including to the extent such laws relate to nondiscrimination on the basis of gender, race, age, national origin and citizenship, disability, veteran status, marital status, sexual orientation or religious beliefs. Suppliers must provide a workplace free from harassment.
- **Anti-bribery and Corruption.** Suppliers shall comply with all Applicable Laws governing anti-corruption, including, but not limited to, paying or accepting of bribes or kickbacks or engaging in other similar unethical behavior.
- **Land Rights.** Suppliers shall respect the land rights of all local and indigenous people and communities and the process of free, prior and informed consent for any agricultural development on land such individuals or communities legally own or possess. Land rights disputes are to be resolved through a balanced and transparent dispute resolution process.

ASR Group expects all Suppliers to require their suppliers, subcontractors, leasing personnel agencies and other members of Supplier's supply chain to also adhere to the Standards.

Compliance

If a Supplier or its supply chain does not comply with the Standards, ASR Group expects the Supplier to notify ASR Group accordingly. ASR Group reserves the right to assess compliance with the Code and require Supplier to undergo a corporate social responsibility compliance assessment (the "*CSR Assessment*"). This is a formal review of a Supplier's endeavors to conduct business in a lawful, humane and ethical manner. A CSR Assessment looks at factors such as working conditions, pay, benefits and work hours, environmental conditions, and general business practices to evaluate the social and environmental impact a company is having in its locations.

The CSR Assessment may take the form of a self-assessment or a third party visit. If practices are found not to be compliant with this Code and its Standards, Suppliers are expected to promptly propose and implement improvements to achieve compliance. ASR Group will work collaboratively with Suppliers to remediate any non-compliances in a timely manner.

Our goal is to make the CSR Assessment process as user-friendly and collaborative as possible. However, ASR Group is prepared to terminate contracts where Suppliers are unwilling or unable to meet the requirements of the Code or where Suppliers refuse to participate in a CSR Assessment.

We thank you for your support and cooperation.