

Introduction

As set forth in the ASR Group's Code of Ethics and Business Conduct, Ethical Sourcing Policy and Supplier Code of Conduct (all of which are posted on ASR Group's website www.asr-group.com under the tab "[DOCUMENT DOWNLOADS](#)"), ASR Group International, Inc. and its subsidiaries (collectively, "ASR Group"), strictly prohibit employees, contractors, and suppliers (collectively, "Stakeholders") from engaging in human trafficking-related activities. These activities include using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, engaging in sex trafficking or procuring commercial sex acts (collectively, "Human Trafficking").

Our Work Force

Most of ASR Group's workforce are permanent employees. If ASR Group engages labor services to provide temporary employees, these labor services must comply with ASR Group's Code of Ethics and Business Conduct, Ethical Sourcing Policy and Supplier Code of Conduct, as well as all applicable laws and regulations. Further, labor providers in the U.K. must be licensed with the Gangmaster's Labour Abuse Authority, an organization that aims to ensure employees' rights are protected.

ASR Group operations undergo a comprehensive yearly social audit by an independent third-party social accountability accreditation firm to, among other things, assure no Human Trafficking activities are occurring in our operations and that our business is being conducted in a lawful, humane and ethical manner.

Raw Sugar Supply Chain

To ensure that ASR Group's supply chain, and in particular its raw sugar supply chain, does not engage in Human Trafficking, ASR Group follows a four-step compliance process in its raw sugar supply chain as follows:

- 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, ASR Group contracts with a number of raw cane sugar suppliers who are Fairtrade certified. The Fairtrade standard prohibits Human Trafficking and the certification is earned and maintained by completing annual audits.

ASR Group employees with direct responsibility for raw sugar and supply chain management also undergo training aimed at reducing hidden Human Trafficking.

Other Suppliers

For the balance of ASR Group's supply chain, ASR Group requires any potentially at-risk Stakeholders to participate in an independent social audit based on the Sedex SMETA 4 Pillars Protocol.

Mandatory Reporting Requirements

Employees having knowledge of credible information concerning actual or potential violations of this policy are required to report them immediately in accordance with the ASR Group's Code of Ethics and Business Conduct. Failure to report actual or potential illegal behavior or violations of this policy may subject employees to disciplinary action, up to and including termination of employment.

ASR Group has many channels available to receive reports of possible violations of this policy. Possible violations of this policy are to be reported directly to ASR Group's Ethics Hotlines, Human Resources Department, compliance professionals throughout the organization, the General Counsel or other members of the Legal Department.

Any grievances concerning Human Trafficking by external Stakeholders can be directed to the Corporate Social Responsibility Department via email at CSR@ASR-Group.com.

Non-Retaliation Policy

ASR Group does not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.

Questions

For questions regarding this policy or its enforcement, please contact ASR Group's Corporate Social Responsibility Department via email at CSR@ASR-Group.com.