



ASR GROUP ETHICAL SOURCING POLICY

INTRODUCTION

ASR Group is committed to understanding the health and safety, environmental, labour, and human rights issues associated with our supply chains. This ethical sourcing policy applies to American Sugar Holdings, Inc. and all of its direct and indirect subsidiaries (collectively, “ASR Group”). ASR Group expects all “Suppliers” to also comply with this policy as further explained below.

“Supplier” means an individual or entity which supplies goods or performs services for or on behalf of ASR Group. It includes, but is not limited to consultants, 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 negative impacts on the environment.

ASR Group’s practice is to require that its Suppliers:

- comply with all laws in their country or the countries in which they do business that are applicable to the goods being purchased or services received, including those concerning the environment, employee rights to freedom of association, wages, benefits and work hours;
- provide employees with a safe and sanitary workplace that includes appropriate controls and protective equipment;
- follow non-discrimination practices in regard to gender, race, age, national origin, disability, citizenship, veteran status, marital status, sexual orientation or religious beliefs and provide a workplace free from harassment;
- refrain from paying or accepting bribes or kickbacks or engaging in other similar unethical behaviour;
- not use any form of forced, bonded or involuntary labour;
- minimize operational impact to air, water, soil, and surrounding areas; and
- require their suppliers’ to adhere to the same requirements as set forth above.

By entering into an agreement with the ASR Group, Suppliers are required to represent that they agree and accept the terms contained in this Policy.

Further, ASR requires its Suppliers to certify that they comply with all laws regarding forced labor, child labor, slavery and human trafficking.

ENFORCEMENT

If ASR Group learns that any Supplier is unable to comply with the requirements of this Policy, ASR Group will, to the extent commercially reasonable and for an agreed period, cooperate with the Supplier to make improvements where its practices fall short of ASR Group’s expectations or, in its sole and absolute discretion, terminate all contracts with the Supplier with immediate effect and without liability.