

This Environmental, Health and Safety Policy (the “*Policy*”) applies to ASR Group International, Inc. and its subsidiaries (collectively, the “*ASR Group*”) and to all employees of ASR Group, including full time, part time, temporary, and contract employees.

ASR Group is committed to maintaining a healthy and safe work environment for all employees and conducting its business in a manner that is environmentally responsible. ASR Group’s policy is for each of its facilities to meet or exceed the requirements of the environmental, health and safety regulations applicable to its location.

ASR Group will seek to continuously reduce the environmental impact of its operations and conserve natural resources. ASR Group proactively minimizes the impact of its operations on people and the environment by implementing best management practices, including pollution prevention, material substitution, waste minimization, material recovery and recycling, and engineering controls. ASR Group promotes a workplace culture in which employees are trained to meet or exceed applicable environmental laws, regulations, and procedures. All ASR Group employees and contractors are expected to take personal responsibility for protecting the environment.

The success of ASR Group’s safety program requires the commitment of management and employees at all levels. All of ASR Group’s facilities are dedicated to safety excellence and to continuous improvement through implementation of health and safety initiatives. All employees are expected to comply with all applicable regulations and ASR Group standards, as well as to continuously practice and enforce incident prevention measures. Additionally, all employees are encouraged to actively promote safety and bring new technologies for incident and hazard elimination to ASR Group’s attention.

Management and employees at all levels are responsible to identify and report any recognized environmental, health, and safety hazards and to work diligently towards meeting this Policy. Through continuous vigilance and constant evaluation of effectiveness, ASR Group will ensure the safest workplace possible for all employees and the preservation and improvement of our surrounding environment.

On behalf of the Board of Directors

Antonio L. Contreras, Jr.
Co-President

Luis J. Fernandez
Co-President