

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, and relevant industry standards 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, immediate response to spills and releases, and engineering controls. ASR Group promotes a culture in which all employees and persons working on its behalf 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. ASR Group is committed to prevention of employee injuries and illnesses through the elimination of hazards and the reduction of health and safety risks. All of ASR Group’s facilities are dedicated to safety excellence and to continuous improvement through implementation of health and safety initiatives, adoption of best management practices, and standardization of engineering controls. ASR Group promotes employee engagement in health and safety improvement through proactive partnership and consultation. ASR Group promotes a culture in which all employees and persons working on their behalf are expected to take personal responsibility for their personal safety and continually and proactively practice incident prevention measures.

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. ASR Group is committed to continuous improvement of its environmental health and safety management system to 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