

If you need to tell us about a concern regarding human rights, please contact us via email at ESGGM@asr-group.com. Please refer to the end of this document for additional guidance.

Introduction

ASR Group is dedicated to conducting business in a lawful and ethical manner in all of its operations. For this reason, we adopted the ASR Group Code of Ethics and Business Conduct. This code applies to all ASR Group personnel, including employees, officers, and directors, as well as our contract personnel and persons that we hire as our agents. We also adopted the ASR Group Supplier Code of Conduct that applies to our suppliers. These codes can be found at our website <https://www.asr-group.com> under the tab “DOCUMENT DOWNLOADS”

We will not tolerate violations of our Code of Ethics and Business Conduct or other corporate codes and policies. Any breaches must be notified, regardless of where they occur across our whole value chain, so that non-compliant behavior can be addressed or prevented.

Our Grievance Mechanism complements programs and processes ASR Group has in place to prevent, identify, and manage concerns throughout our value chain. We are guided by Section 31 of the United Nations Guiding Principles on Business and Human Rights, which sets out the principles for good business-led grievance mechanisms.

If a situation of concern arises, ASR Group commits to work with the relevant stakeholders to seek a resolution.

For purposes of our Grievance Mechanism, we consider stakeholders to include customers, suppliers, contractors, subcontractors, and members of the communities where we and our suppliers operate. Employees and other ASR Group personnel can voice concerns through the ASR Group Whistleblowing Policy as well as other means.

Our Approach

ASR Group aims to promote and respect all fundamental human rights outlined in the United Nations’ International Bill of Human Rights and the International Labor Organization’s Core Conventions, as set out in the Declaration of Fundamental Principles & Rights at Work.

We also recognize the principles under the OECD Guidelines for Multinational Companies to use our leverage to seek and implement solutions to assist any affected parties. To that end, when implementing our protocol, we will work with stakeholders to understand the matter. If appropriate, we will use our influence to seek a resolution.

Oversight and Accountability

Our Grievance Mechanism falls under the responsibility of the following departments: Legal, Corporate Social Responsibility (CSR), Communication, Risk Management and Corporate Affairs.

The Chief Sustainability Officer (CSO) oversees the CSR department. The CSO and the Vice Presidents for the other departments report to the President and the Board of Directors.

Matters related to Human Rights are discussed at Management Committee and Board of Directors meetings when necessary.

Grievance Mechanism – Protocol and Steps

Protocol

If a grievance is reported, the ASR Grievance Mechanism protocol will be deployed. This protocol is based on OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

Steps

ASR Group will make reasonable efforts to ensure a timely response to all reports, although the time we take will vary depending on the issue.

The ASR Group grievance process is as follows:

- Step 1** A grievance is reported to ASR Group. We will acknowledge receipt within seven days and conduct an initial analysis of the grievance within four weeks of receipt.
- Step 2** Investigating the grievance. Our oversight teams will lead an investigation of the grievance, utilizing areas of expertise within our organization as appropriate.
- Step 3** Action plan. If actions or remediation are appropriate, we will work with the stakeholder that is the subject of the grievance to agree on a path forward and communicate the plan to the complainant where appropriate.
- Step 4** Monitoring and implementation. ASR Group will work with the stakeholder to confirm that the agreed actions and remediation are completed, at which point the grievance will be closed.

Where a grievance concerns a supplier that is unwilling or unable to meet the requirements of the ASR Group Supplier Code of Conduct, ASR Group is prepared to

terminate contracts with such supplier. At the complainant's request, ASR Group will inform the complainant of the conclusions of any investigation within 15 days of the investigation's conclusion. Reports will be stored for at least five years, or, if longer, until conclusion of any administrative or judicial process related to the report.

Grievance Mechanism Activation and Options

Any grievances by external stakeholders should be directed to the Corporate Social Responsibility Department via email at ESGGM@asr-group.com.

Reporting

ASR Group will provide an update on our efforts to ensure compliance with our Supplier Code of Conduct in the context of our supply chains annually.