



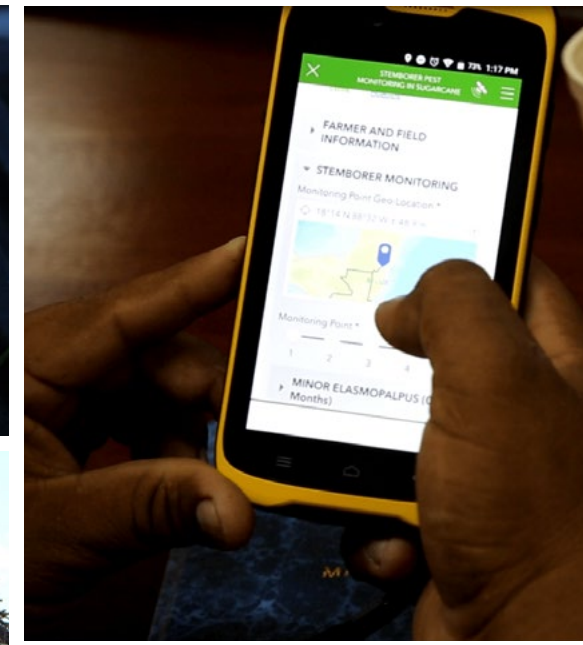
# SUSTAINABILITY REPORT

OUR 2019-2021 **JOURNEY**



# WHAT'S INSIDE

EXECUTIVE SUMMARY	03
ABOUT ASR GROUP	08
ESG VISION AND STRATEGY	13
DECARBONIZATION	15
RESOURCE CONSERVATION AND CIRCULARITY	30
SUSTAINABLE AGRICULTURE	46
SUSTAINABLE AND ETHICAL SUPPLY CHAIN	49
EMPLOYEE AND COMMUNITY ENGAGEMENT	66
GOVERNANCE, COMMUNICATION AND REPORTING	82
CLOSING	87
APPENDIX	89



# A Message from Our President

We are excited to share this report with you in which we set out how we plan to meet our goal to be the most sustainable and ethical sugarcane company and achieve net zero carbon as fast as we can. We have challenged the organization to set the most aggressive goals possible and to exceed such goals, exploring many technologies and investments, old and new, to achieve these objectives.

We are the largest cane sugar refining company in the world and are committed to be the most sustainable. To this end, we commit to reaching carbon neutrality by 2040 and carbon net zero by 2050, and doing so while respecting the people who work for us and with us, as well as the environment we work in.

The challenges that the recent pandemic brought have shown us how we can adapt, and even thrive, in times of crisis by collaborating and supporting one another. We understand even more strongly now, that for our business to thrive tomorrow, we need to act today. From the sugarcane farms to the final products we sell, everything we do visualizes the future we want to create, with respect for our planet, our communities, our employees and our customers.

Sugarcane has special qualities as a fast-growing grass, that can help us to create a more sustainable future. It is one of the most efficient plants in the world at photosynthesis, as a highly efficient C4 plant, which means it grows faster and is better at absorbing carbon dioxide than many other plants. Importantly, during our process, none of the sugarcane plant is wasted. In addition to being a very efficient producer of sugar, the sugarcane plant produces substantial amounts of renewable biomass. We use this biomass to generate green energy - both electricity and steam - that powers our sugar mills. We also use this biomass to make compostable tableware, to replace plastic and styrofoam, under the Tellus brand.

When sustainably cultivated and processed, sugarcane has the power to improve the environment, prosper diverse communities and safeguard the ingredients that are part of life's best moments. We are ASR Group, making life sustainably sweet for future generations.



**Luis Fernandez**  
President



**Luis Fernandez**  
President



# EXECUTIVE SUMMARY

Since we published our last Sustainability Report covering FY18 we have continued to work toward understanding our systems and our influence on the world around us.



# OUR JOURNEY 2019-2021

Since we published our last Sustainability Report covering FY18 we have continued to work toward understanding our systems and our influence on the world around us. To strengthen our commitment to sustainability, we hired our first Chief Sustainability Officer (CSO) to lead our talented international sustainability team. We have developed and implemented a comprehensive sustainability vision and strategy, to deliver our board-approved Environmental, Social, and Governance (ESG) objectives. Our ESG Program is maturing and we are excited to share our work and impacts in this FY21 publication.

Our support for the communities and environment we depend on has remained strong, and we have created tangible value for our stakeholders and our business by identifying new opportunities, reducing and managing risks and lowering our costs. In tandem, we are also expanding our sustainability ambitions across our entire value chain, to give us a greater opportunity to manage our product's carbon footprint or life cycle.

This report describes our work through Fiscal Years (FY) 2019, 2020, and 2021, while mainly presenting data from FY21.

# 2019 - 2021 Highlights



Formalized our **ESG** organizational structure.



Reinforced and expanded our short, mid, and long-term **climate change goals.**



Completed a company-wide **product life cycle analysis** by business unit.



Developed climate change mitigation plans and sustainability roadmaps for each business unit to accomplish our short-term **2030 Objectives.**



Expanded **our commitment** to sustainability certification by internationally recognized social and environmental standards across our entire business.



Assessed **77%** of raw sugar arriving at our refineries using one of our Corporate Social Responsibility (CSR) verification tools.



Achieved **100% sustainably** sourced supply of purchased raw sugar for our Toronto and Lisbon Refineries.\*



Paid more than **\$11 million (USD)** in Fairtrade Premiums to Fairtrade-certified Small Producer Organizations.



Positively impacted the lives of more than **10,000** farmers by facilitating income diversification, improving agricultural best management and health and safety practices.

# Ambition Pillars

Our newly appointed CSO and ESG team have produced an ESG strategic framework that sets out comprehensive objectives and commitments to build on those identified in the FY18 report. Our programs continue to contribute to several principles of the United Nations Sustainable Development Goals (UN SDGs):

click each box

**DECARBONIZATION**

**RESOURCE CONSERVATION AND CIRCULARITY**

**SUSTAINABLE AGRICULTURE**

**SUSTAINABLE AND ETHICAL SUPPLY CHAIN**

**EMPLOYEE AND COMMUNITY ENGAGEMENT**

**GOVERNANCE, COMMUNICATION AND REPORTING**



# About ASR Group

ASR Group is the world's largest cane sugar refining company.



# Corporate Overview and Brands

ASR Group is the world's largest cane sugar refining company. ASR Group is jointly owned by Florida Crystals Corporation and Sugarcane Growers Cooperative of Florida, two Florida-based agricultural companies that collectively farm sugarcane on 285,000 acres of land in South Florida and produce raw and refined sugar. Though owned by Florida Crystals Corporation and Sugarcane Growers Cooperative of Florida, ASR Group is maintained as a separate legal entity, and this report is restricted to the business of ASR Group.

Our brand portfolio includes:



OUR FAMILY OF BRANDS



# Our History: At a Glance



1998, Florida Crystals and Sugar Cane Growers Cooperative partnered to acquire Refined Sugars, Inc., with a cane sugar refinery in Yonkers, NY.



2005, we expanded to the West Coast with the acquisition of C&H Sugar Co., Inc., allowing us to serve customers nationwide more effectively. The purchase of C&H added another sugar refinery and the leading sugar brand on the West Coast to our business.



2007, we expanded our operations to Canada and Mexico to become the premier sugar producer and supplier in North America. First came the acquisition of Redpath Sugar in Toronto, Canada. Then, we acquired Ingenio San Nicolas in Veracruz, Mexico.



2012, we announced our expansion into Central America by acquiring a majority interest in Belize Sugar Industries, Ltd., a supplier of Fairtrade cane sugar.



2020, we acquired Tellus Products, LLC which produces compostable tableware and foodservice products from sugarcane fiber.

1998

2001

2005

2006

2007

2010

2012

2013

2020

2001, Domino Sugar was acquired with three East Coast cane sugar refineries and the nation's leading sugar brand, Domino®. The company became American Sugar Refining, Inc.



2006, we added Chr. Hansen's specialty division. Hansen added to our offering of specialty sweetener products, including molasses, malt, rice syrup, oat extract, honey, and invert and fondant sugars, with production facilities in Louisiana and Illinois.

2010, we acquired Tate & Lyle PLC's European cane sugar operations, the leading cane sugar refiner in the EU. The acquisition of its refineries in London, England, and Lisbon, Portugal, increased our total refining capacity to 6.5 million tons per year. This acquisition also included the right to use the distinguished Tate & Lyle® brand for sugar, the Lyle's Golden Syrup factory in Plaistow, England, and the Lyle's® brand.



2013, we expanded into the Italian market by purchasing 50 percent ownership of SRB S.p.A., a cane sugar refinery in southern Italy.



# Our Value Chain



## FARMING

The value chain begins when farmers grow the sugarcane which they deliver to a local mill for processing. Sugarcane is a tall grass that thrives in tropical and sub-tropical climates taking 12 months to mature to harvest. It is grown by smallholders, conglomerate farming groups, or large estate farms. Farming operations are either managed by independent farms or by the mills that process the cane.

## MILLING

Once the sugarcane has been harvested, the first stage of processing takes place at a mill. Mills are located close to the farms to process the sugarcane while it is fresh. Mills process sugarcane into raw sugar that is either sold directly to consumers (if produced in a food grade sugar mill) or sent to a sugar refinery for further processing. Both our sugar mills in Mexico and Belize produce raw sugars, such as demerara, for direct consumption.

## REFINING

Our refineries in the USA, Canada, the UK, Portugal, Italy, and Mexico process raw sugar from our mills, as well as third-party mills. Through the refining process, large quantities are processed into a range of sugar products such as granulated, liquid, brown and powdered sugars.

## PACKING

Products are packaged and shipped to both industrial and retail customers. The latter also receive product in bulk.

## TRANSPORT AND LOGISTICS

A range of vehicles, including trucks, railcars, barges and ships, transport our sugar.

# FY18 Materiality Assessment: Where We Must Focus

## Top 5 priority themes for ASR Group



Water Stewardship and Agricultural Management  
(owned and third party)



Land Rights  
(owned and third party)



Health and Safety  
(owned and third party)



Human and Labor rights  
(owned and third party)



Supplier Traceability and Transparency

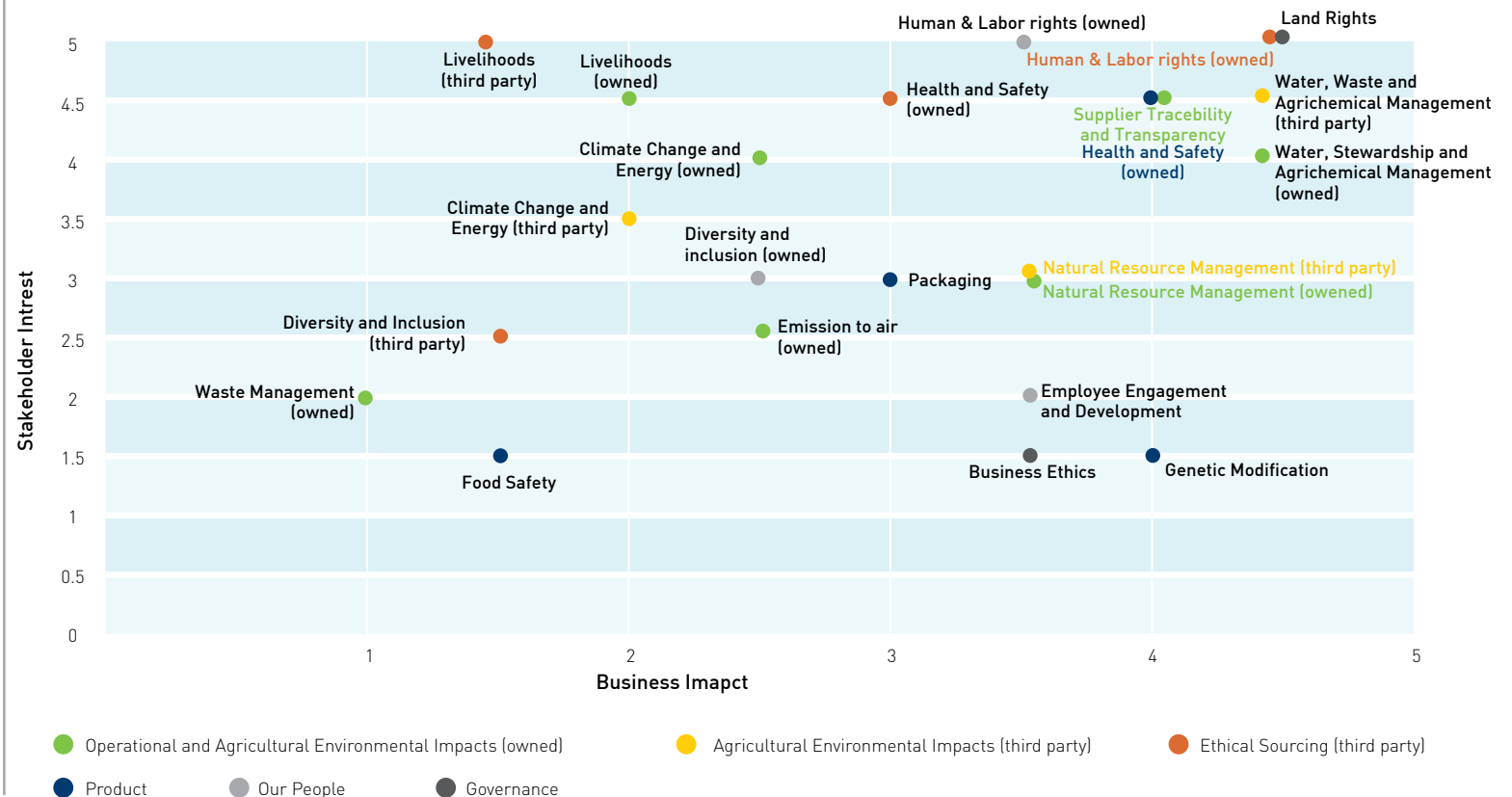
Our sustainability strategy and reporting focuses on the areas that are most significant to our business and our stakeholders.

In FY18, to help us develop our sustainability goals, we completed a materiality assessment with the support of an independent consultant, bringing together internal and external stakeholders (including millers, farmers, customers and NGOs from three selected sourcing regions) to challenge our assumptions, understand potential risks, share best practices and develop our goals. The scope of the assessment did not include the impacts of our products on end-users nor did it include consideration for post-consumer end-of-life influences. The findings from this consultation are given in the chart across. The position of each issue on the chart reflects stakeholder interest and the potential business impact for ASR Group.

(This materiality assessment is due for re-evaluation in 2023).

## Materiality Matrix

This matrix plots business impact scores against stakeholder interest scores for each material issue.





# ESG VISION AND STRATEGY

We aspire to be the most sustainable and ethical sugarcane company and achieve net zero carbon as fast as we can.

# ESG Vision

We aspire to be the most sustainable and ethical sugarcane company and achieve net zero carbon as fast as we can, for now and for generations to come. That is why we have identified six focus areas for our sustainability journey:

click each box 



**DECARBONIZATION**



**RESOURCE CONSERVATION AND CIRCULARITY**



**SUSTAINABLE AGRICULTURE**



**SUSTAINABLE AND ETHICAL SUPPLY CHAIN**



**EMPLOYEE AND COMMUNITY ENGAGEMENT**



**GOVERNANCE, COMMUNICATION AND REPORTING**

To achieve our vision and objectives, we have engaged a sustainability taskforce comprised of engineers, managers, and a Chief Sustainability Officer (CSO). To maximize resources and responsibilities, the team have identified three project tiers to focus on, with well-defined cross-functional, multi-departmental roles and responsibilities.



# DECARBONIZATION

We aim to be the lowest carbon sugar company in the world.

# Our Decarbonization Approach

**We will cut our direct (Scope 1 & 2)<sup>1</sup> emissions in half by 2030 and become carbon neutral globally by 2040.**

**We will achieve carbon neutrality by:**

- improving our day-to-day operational efficiency and reliability
- reconfiguring our processes to make them more energy efficient
- greening our energy mix
- exploring innovative technologies and,
- using alternative fuel sources for our operations and transport fleet.

**We will be net zero carbon by 2050 (Scope 1 - 3).**

While we have direct control over much of our carbon, an important percentage lies with third-party suppliers. We want to achieve our net-zero ambition as fast as possible and are working with our external partners to accelerate the pace and scale of their decarbonization.

Each of our products globally will have a published individual, transparent carbon footprint (product life cycle) to inform customer and consumer choice. For detailed information on emissions by sites, please refer to our CDP annual disclosure under the company name "ASR Group Int."

<sup>1</sup> When compared to ASR Group's established 2012 baseline.





# Product Life Cycle

## We aim to understand and act on ways to cut the carbon footprint of our products.

To understand the carbon footprint of our product, we have conducted a product life cycle analysis (pLCA), adhering to the GHG Protocol's Product Life Cycle Accounting and Reporting Standard. Our first step captured the emissions associated with our own operations (Scope 1) and the electricity we purchase (Scope 2). For our second step we have begun the complex task of calculating and tracking the resulting emissions from activities of the people and businesses that we interact with (Scope 3).

Our pLCA focuses on the carbon emissions associated with our product, without differentiating between our various product types. We are currently extending our emissions analysis to include the transportation of our product to the consumer. Future reporting will include analysis by product type and their consumption emissions.

A breakdown of our sugar's carbon footprint is as follows.



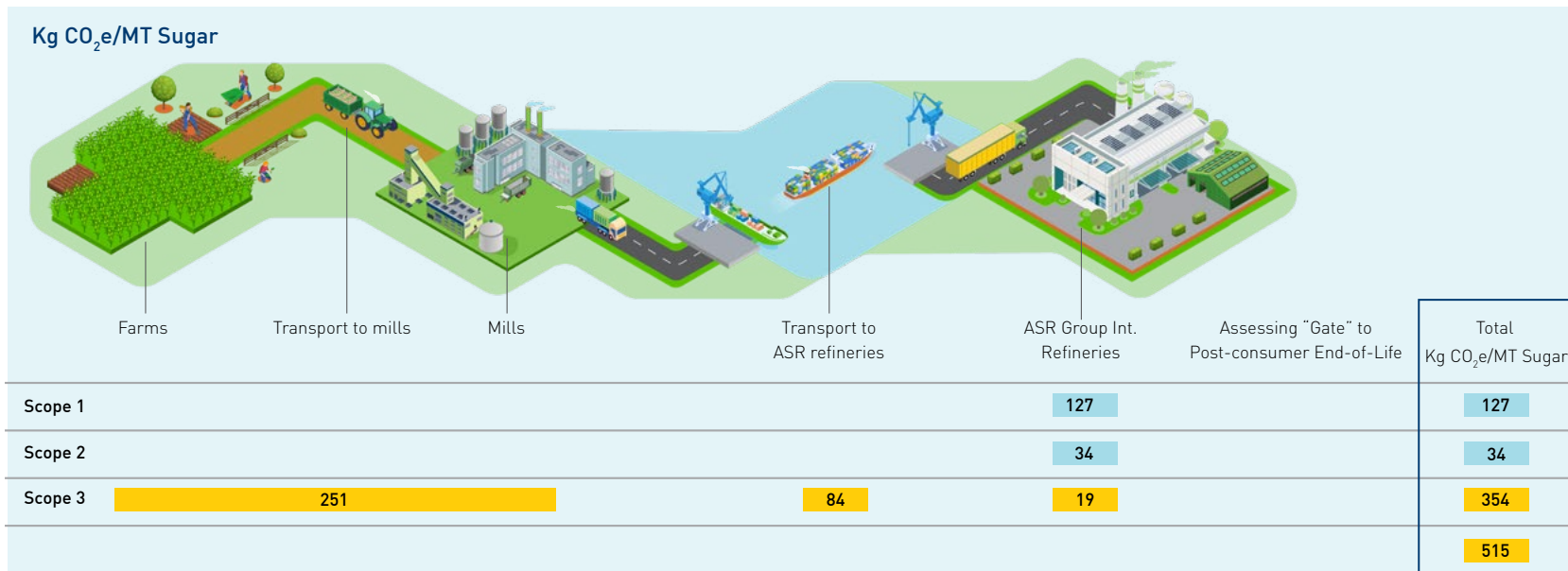
# Value Chain Product Life Cycle Analysis (pLCA)

The following graphics represent the carbon footprint of our product during the operations stage at the refinery level<sup>2</sup>. This depiction shows the carbon emissions associated with our product as it moves through each step in the supply chain. We provide a pLCA report for each region in the Appendix. We are currently engaging a third party for validation of our pLCA.

## Our carbon emissions originate from:

- Farm and mill: Fertilizer production and decomposition as well as fuel used in vehicles
  - Regional FAO data was used where supplier data was not inventoried.
  - Land use change influence is under review.
- Logistics: Freight movement by shipping vessels
- Refineries: Stationary fuel use for process steam generation, downstream wastewater treatment needs, energy required for ingredient supplies and solid waste treatment

## Farm to Refinery Gate pLCA for ASR Group FY21



<sup>2</sup> Not all categories of Scope 3 influence have been calculated; please refer to page 113 for a heat map outlining the current program maturity.

# Our Operations

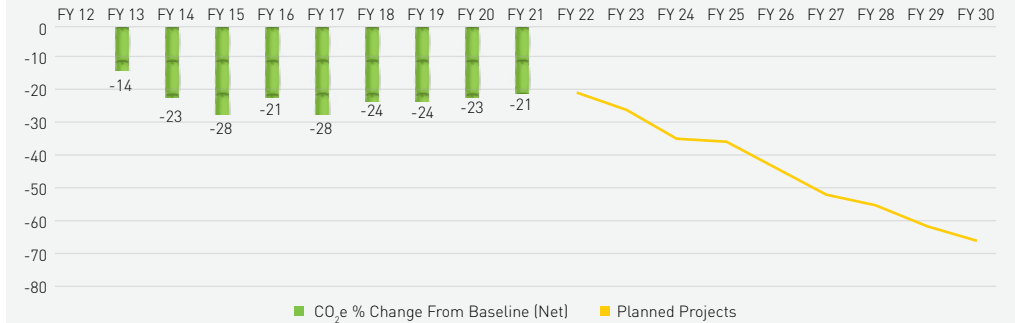
## We aim to decrease our net GHG emissions through operational efficiency.

Between FY19 and FY21, our net GHG emissions increased slightly due to operational inefficiency and aging infrastructure in some of our refineries. We plan to return to steady operational efficiency through investments in FY22 and FY23. By then, we will be realizing the benefits of our other sustainability projects and an operational reliability program.

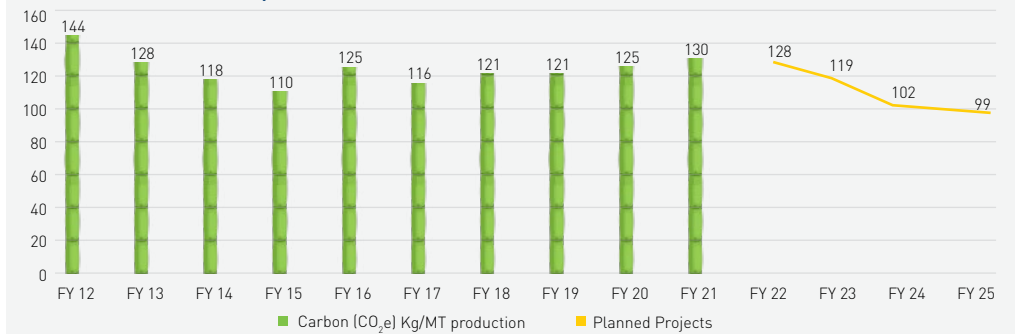
The graphs outline our targets for our decarbonization program based on planned projects:



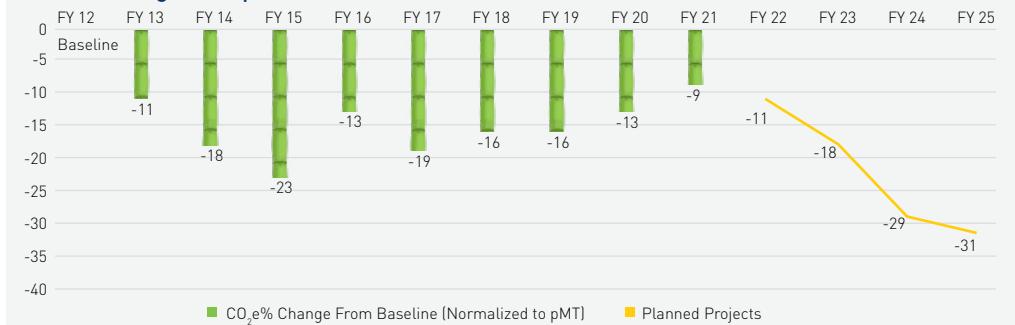
### Company GHG - Scope 1 & 2



### GHG Normalized - Scope 1 & 2



### GHG % Change - Scope 1 & 2 (normalized)




# Agriculture and Milling Activities

**We will continue to decarbonize our own agriculture operations by applying evolving best practices in line with international GHG protocols and NGO guidance for agricultural activities.**

While we purchase raw sugar from mills around the world, we also own sugar mills in Belize and Mexico. Most of the sugarcane supplied to our mills comes from local smallholder farmers, although part of the farm activity at our Belize and Mexico sugar mills is owned and operated by us.

**Most carbon emissions in our farming and milling operations come from:**

1. The production, application, and decomposition of soil additives like fertilizer.
2. The fuel use in vehicles to cultivate and transport sugarcane for processing.

click each box 

To make processing the sugarcane at the mill more efficient, most farming operations include prescribed burns to remove excess leaves and prepare the cane for harvest. The carbon dioxide (CO<sub>2</sub>) released during prescribed burns is a natural biogenic emission recaptured through photosynthesis and too short-lived to impact the active carbon cycle.

However, fractional amounts of nitrogen dioxide and methane gas are released, which do contribute to our emissions. The decision to conduct a prescribed burn depends on several factors. For example, where cane is harvested manually, it is safer for field workers if excess leaves are removed by burning. Also, if the heavy unburnt cane leaves were to be transported this would add further trips and therefore more fuel would be used, along with the associated emissions.

Although the carbon impact of our mills is already very low, we continue to seek ways to reduce greenhouse gas production. Our Belize and Mexico mills supply green electricity to the national grid, and we are focused on optimizing mill performance to deliver even more green energy into the regional energy mix. Our product's carbon footprint from farm to mill for both our Belize and Mexico operations can be found in the Appendix.

# Refineries and Co-packing Facilities

To reduce our emissions and become carbon neutral by 2040, we are investing in ambitious operational efficiency and renewable energy programs.

We own and operate eight refineries around the world. During the refining process, raw sugar is melted then filtered through a high-energy process to remove impurities before it's crystalized into the wide variety of sugars we sell to the market. Many of our products are packed and shipped directly from our refineries. In some cases, bulk products are shipped to one of our co-packing facilities or Non-Refinery Operations (NRO) so they can be packed closer to the point of distribution and sale.

Initial feasibility studies show the potential to meet our 2030 Scope 1 and 2 objectives if we adopt the following three workstreams:

- 1. Continuous improvement and relentless efficiency:** we are optimizing and upgrading our refining technology and processes to maximize efficiency today, while preparing us for the technologies of tomorrow.
- 2. Proven technologies:** we are identifying "best in class" technologies from around the globe, which have not yet been integrated into our portfolio, to progress our near-term decarbonize goal. In addition, we have significantly increased our ability to use renewable energy in our biomass-supported facilities and we are continuing to invest in capital projects, helping us to investigate and adopt new technology.
- 3. Emerging technologies:** we are developing and testing emerging technologies at our plants to explore how we will apply them in the future. Solutions we're investigating include electrification of manufacturing processes; carbon capture and utilization; industrial ecology (finding opportunities to put waste heat from our operations to productive use); and hydrogen as a fuel.



## Highlight Story: Crockett Refinery's Conversion to LED Lights Illuminates Our Companywide Energy Reduction Initiative

The sustainable conversion from metal halide lights to energy-efficient LED bulbs at the Crockett Refinery shows our commitment to reduce our energy consumption through every means available. The upgrade replaces more than 475 lights across the plant.

This investment will reduce the refinery's energy consumption by more than 1.2 million kWh per year, which is equivalent to removing 185 cars from the roads. LED lights also last longer and are more durable than halide or halogen lights. The conversion to LED lights in Crockett is a preview of the work that will be taking place across our facilities around the globe as we expand the conversions companywide.



## Highlight Story: Installation of Electric Vehicle Charging Stations Continues to Expand Globally

**W**e are continuing to install more electric vehicle (EV) charging stations at our sites to benefit our employees and the environment. In recent years, we have invested in and installed charging stations at select sites to support our employees' use of EVs and plug-in hybrid electric vehicles (PHEVs) that are becoming popular for their environmental and cost-saving benefits.

EV charging stations are available at the Baltimore Refinery in Maryland and at the Thames Refinery in London. The installation of EV charging stations helps our employees make sustainable decisions in their own lives by giving them access to renewable infrastructure at work. Additionally, the Chalmette Refinery, outside New Orleans, has a charging station for its emergency response vehicle. At the Lisbon Refinery, we



have installed EV charging stations for our new forklifts, which have proven highly efficient, allowing five to six hours of work with only two to three hours of charging.

## Highlight Story: ASR Group Sustainably Restore Baltimore Refinery's Iconic "Domino Sugars" Sign

**W**hen it came time to restore the iconic, neon "Domino Sugars" sign at our Baltimore Refinery in Maryland, it was important to preserve the look of the original, which has been a beloved part of the Baltimore skyline since 1951. We also saw this as an opportunity to make the renovated sign even more sustainable. We repaired and repainted the sign's entire support structure with eco-friendly elastomeric paint and installed eco-friendly lighting. The sign's reproduced letters and border feature state-of-the-art LED lighting that mimics the appearance of the original neon, saves 33,000 kWh per year and reduces more than 23 metric tons (MT) of CO<sub>2</sub> annually. A photovoltaic array of 76 solar panels on one of the refinery's administration buildings produces more clean, renewable energy each year than is needed to power the sign.



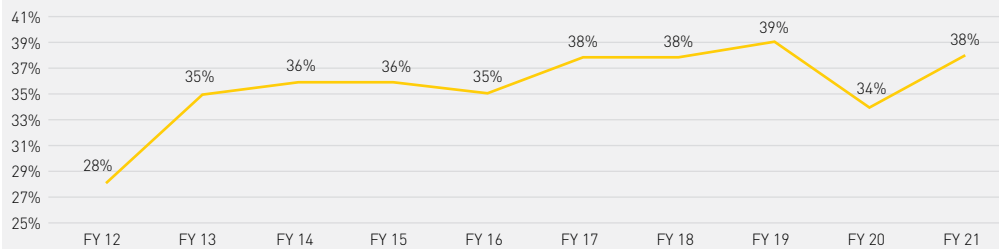


# Renewable Energy in Our Operations

**We are committed to securing renewable energy contracts as they become available in our areas of operations.**

Our Mexico and Belize mills use sugarcane fiber, called bagasse, to produce green electricity, while our Brindisi Refinery uses ethically sourced, renewable-certified palm oil for energy. Thus, in FY21, 38% of our net energy production was derived from renewable energy sources. That energy, which is usually represented as MMBTU (Millions of British Thermal Units), is used as steam in our process, while also providing electricity for our systems.

**% Renewable Energy Produced**



As our facilities do not use all the energy produced, we export the surplus power to surrounding electrical grids at our many locations. During FY21, we provided slightly more than 269,720 megawatt hours of electricity to surrounding municipal utility systems, of which more than 232,045 megawatt hours were from renewable sources. This is enough green energy to power roughly 21,500 US homes for a year<sup>3</sup>.

<sup>3</sup> According to the Energy Information Administration in 2020, the average annual electricity consumption for a US residential utility customer was 10,715 kilowatt-hours (kWh), or an average of about 893 kWh per month.

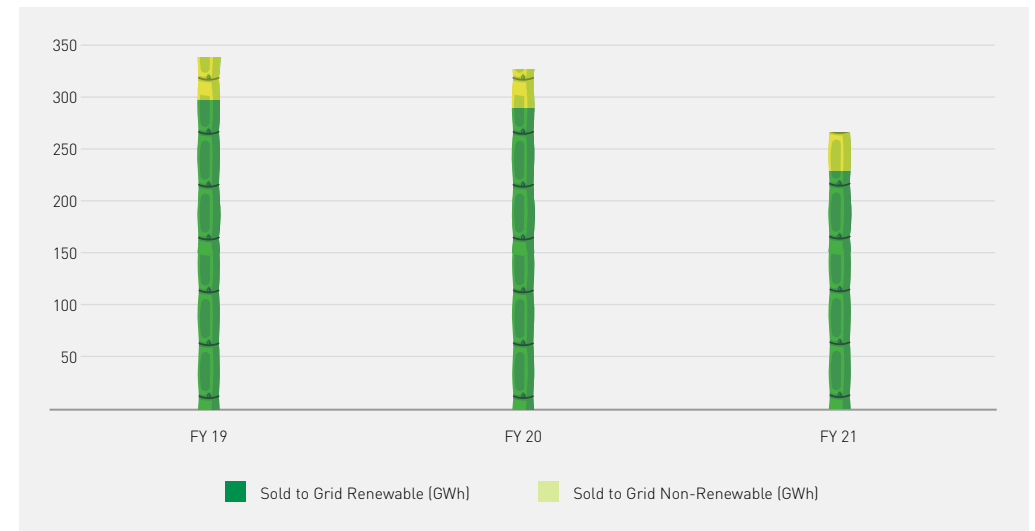


# Renewable Electricity in Our Operations



In FY19, our green energy offsets to the grid increased due to improved performance by our mills in Mexico and Belize. However, there was a reverse effect in FY20 due to drought and limits in production. We also experienced turbine difficulties and replacements at both our mills in FY21 that disrupted our green energy sales. We aim to return to our FY19 green energy figures in FY22.

The following graph represents electricity sales to local utility grids. Most of the electricity that we sell to the grid is green. However, this is not indicative of the electricity we buy from utility providers, nor does it represent our own consumption of electricity. For further detail in these categories, please feel free to reach directly to ASR Group representatives.



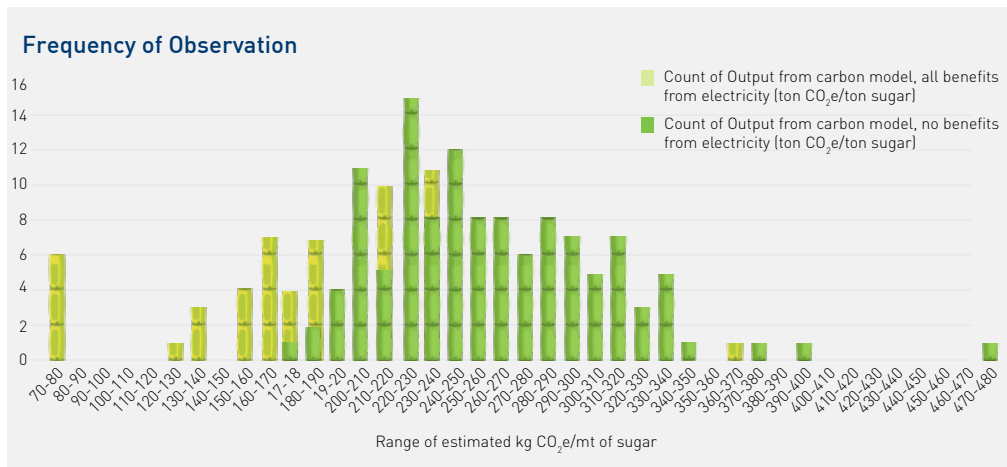
In FY21, our Plaistow and Thames facilities converted to a 100% green energy contract with their local utility.

# Raw Sugar Sourcing

## Farm to Third-Party Mills

We've been collaborating closely with our supplying mills and shipping service providers to understand the greenhouse gas emissions generated from deliveries to our operations. We've produced a graphical model using data collected from our suppliers to represent the carbon footprint of the raw sugar's journey from farm to mill.

The model below shows two different sets of data, given the complexity and need for greater due diligence around carbon credits and claims noted in recent United Nations conferences. The first set (light green) depicts the green energy offset benefits from renewable energy production in the mills. Here, we assume that carbon credits associated with this energy generation belong to the mill and are "retired" by the owning entity. The second data set (dark green) assumes that those benefits are not awarded, to avoid the potential that the country already counts the Renewable Energy Credits (RECs) in its utility grid fuel mix (even though they may be owned by the producing mill). As our carbon programming continues to develop, we will validate such claims through a third party.



We are working to improve the accuracy and understanding of the associated Scope 3 emissions through further engagements and collaboration. As we develop, we will set minimum expectations on our suppliers to drive the net zero objective.

## Mills to Our Refineries

Raw sugar is transported from the mills to our refineries globally in bulk, ocean-going ships. We engaged with our service providers and gathered specific information on our freight movements and the amount of fuel it takes to send raw sugar to our refineries. By understanding the shipping channels used, we can work to reduce our carbon influence where possible by minimizing distances in transit. Additional key performance indicators will be developed in future iterations of this report, and we continue to engage with our service providers to take them with us on our sustainability journey.

## Raw Sugar Origins



# Purchased Goods and Contracted Services

## Materials Purchasing

A key component of measuring our Scope 3 carbon emissions involves understanding the impacts of our many purchased goods and contracted services. Currently, we're working to assess direct consumption materials, process chemicals, maintenance and repair of equipment, and services.

Next, we'll fully map out our supply lines and develop a GHG emissions model using a data acquisition and reporting system.

## Production Gate to Consumer

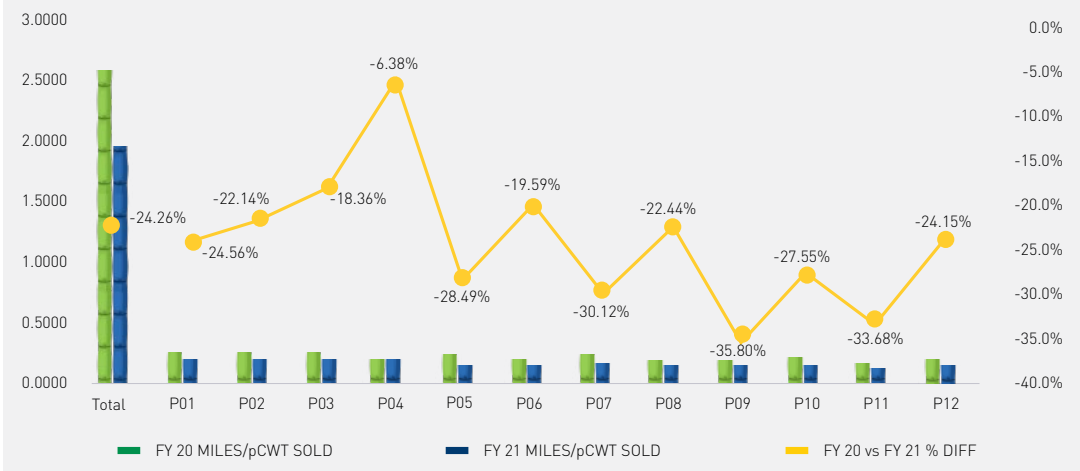
Once a product leaves our facilities' gates it's much harder to track emissions than it is when it's under our direct control. We are currently researching the impacts of distribution to our customers as well as the post-consumer end-of-life impacts (upon consumption). There are many factors outside our direct control, so we are focusing first to affect those we can. We are working with third-party carriers and warehouses as well as with our own facilities to reduce the mileage our product travels. We have set an objective to reduce product transfers between our own sites, (Stock Transfer Orders (STO)), by 25% by 2025, compared to our FY21 benchmark.

By the close of FY21, we had successfully reduced STO miles by approximately 24%, nearly double our annual target. To achieve this, we identified more efficient routes as well as alternate methods of transport, such as rail, which has much lower emissions than transportation by truck. We converted five of our long-distance shipping lanes, from truck to railroad, eliminating an average of more than 800 truck miles per lane. As well as reducing our STOs, we are constantly looking for quicker ways to transport our product directly to the customer, reducing warehouse stops before arriving at the final destination.

We measure emissions in our supply chain using CH Robinson Logistics' Emissions IQ Tool and the Environmental Protection Agency's (EPA) SmartWay program (see highlight story). We also work with third-party warehouses and carriers to align our sustainability efforts beyond emissions reduction. We've surveyed more than 60 of our carriers in the US, UK, Canada, and Portugal, as well as several warehouses in Canada and the US.



STO Miles Traveled by pCWT Sold All Regions



## Highlight Story: ASR Group Becomes EPA SmartWay Shipper Partner

Shipping is an important part of our value chain, and our objectives to reduce emissions are set to address the impact of transporting both inputs and finished products. Our efforts align with the ambitions of the international shipping community and the International Maritime Organization (IMO) to cut greenhouse gas.

With that in mind, we joined SmartWay<sup>4</sup> in FY21, which is an initiative run by the US EPA that helps companies advance supply chain sustainability by measuring, benchmarking, and improving road freight transportation efficiency.

As a SmartWay shipper partner, we can view weekly carrier performance rankings, access tailored training to improve shipper performance and view carbon emissions generated from all freight activity and peers.

In the US, we improved the percentage of SmartWay carriers used from 82% to 88% from FY19 to FY20.

<sup>4</sup>[Find out more about SmartWay.](#)



This success puts us among the top 25% of EPA SmartWay Shipper partners. Collaboration with other leaders in this area will give us greater insight into our freight activity and will help us to benchmark sustainability considerations for carrier scorecards.



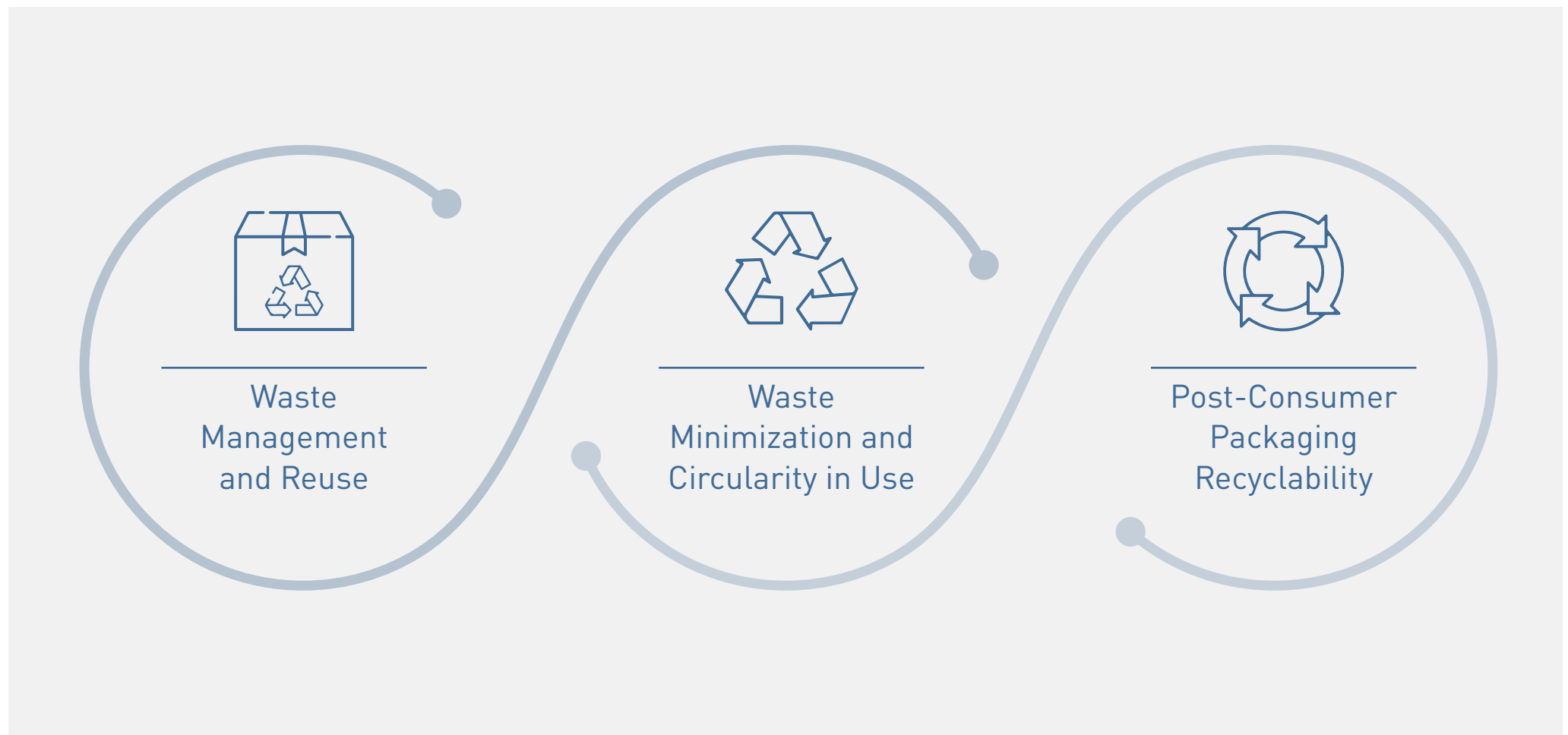
# RESOURCE CONSERVATION AND CIRCULARITY

We will become a cradle-to-cradle company.

# Our Resource Conservation and Circularity Approach

To conserve finite natural resources, we use them to the best of our abilities, ensuring any waste is eliminated, reused or recycled.

We define our Resource Conservation and Circularity strategy based on the ideologies defined by circular economy principles, where growth is decoupled from the resources used, primarily through the recirculation of natural resources. Based on our Materiality Assessment and our understanding of our processes, we have focused our efforts on three primary categories: **Water Management and Reuse, Waste Minimization and Circularity in Use, and Post-Consumer Packaging Recyclability**



# Water

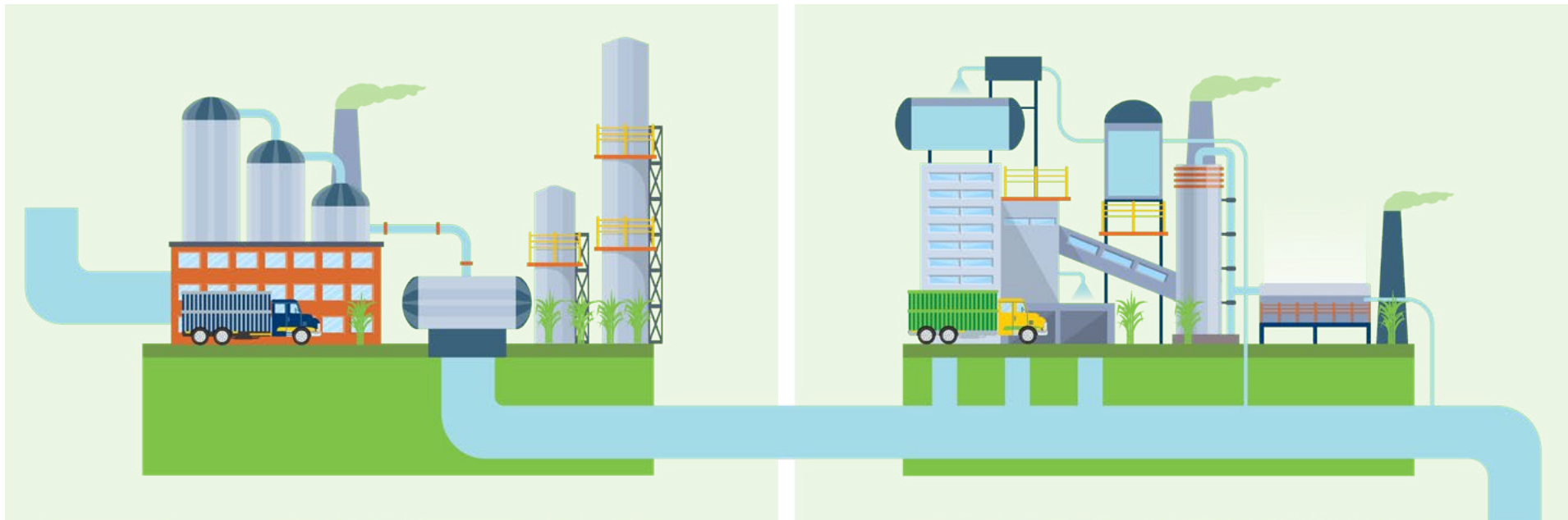
Water can enter and exit our milling and refining processes in the following ways:

## → Entry:

- Non-contact cooling - Surface water is used to aid in the recrystallization of sugar after filtration or extraction from sugarcane, but without physical interaction with the process.
- Multi-purpose/utility - Water purchased from our utilities is used in boilers, and for cleaning and consumption.
- Sugarcane (Mill only) - Water released from grinding the sugarcane, and reused in the rest of the process.

## Exit: →

- Directly returned to watershed - Non-contact cooling water passes through the process without significant alteration.
- Discharged to treatment plants - Water is used to clean process equipment.
- Lost to evaporation - Primarily in the form of vapor emitted to atmosphere while moving from liquid sugars to crystal, but also from other water-based cooling systems.
- In our products - Water is found in liquid sugars and syrups.



Wherever possible, we find steps along the way where we can reuse water for example by converting steam back into water through condensation. However, we will continue to develop our systems to minimize our water demand as we pursue our objectives in this area.

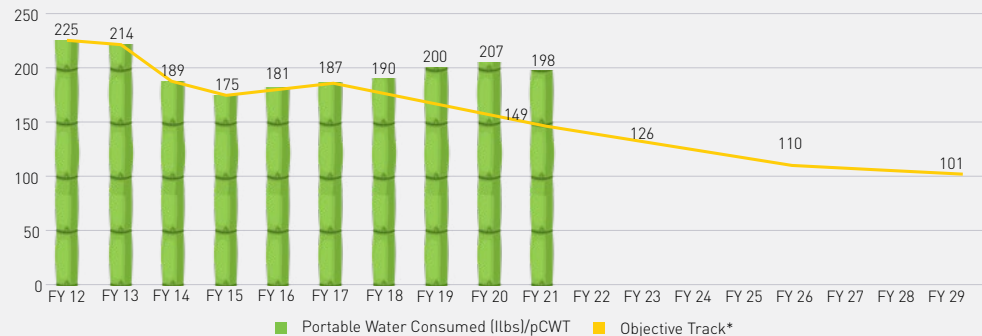


# Potable Water Usage

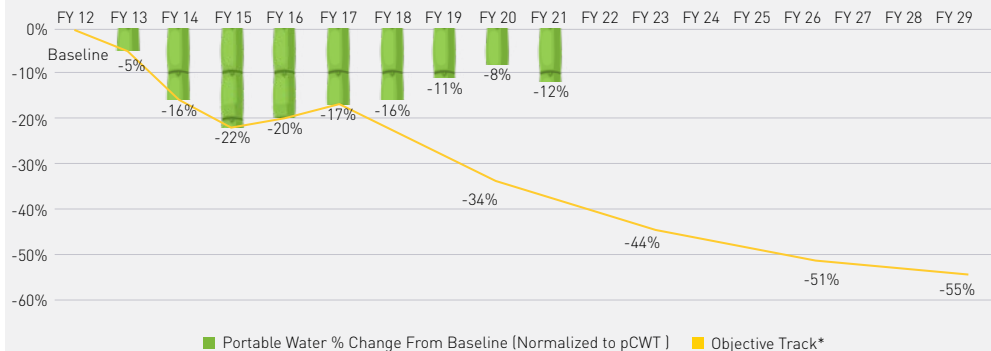
## We will reduce our potable water usage by 55% by 2030.

We have made significant progress toward this goal by making changes to our refining process. Progress can be affected, however, by our production rates or customer demand. Slower production due to inefficiencies can significantly increase our water demand on a per unit basis. Furthermore, certain product lines such as brown sugar and liquid sugar are more water-intensive than others so, if demand for brown sugar goes up, so does our water usage. The graph represents our potable water usage. We want our current approach toward water conservation, with a focus on recovery of evaporative loss, to reverse the current trend and get us back on track to meet our objective.

### Water Consumed



### Water % Change

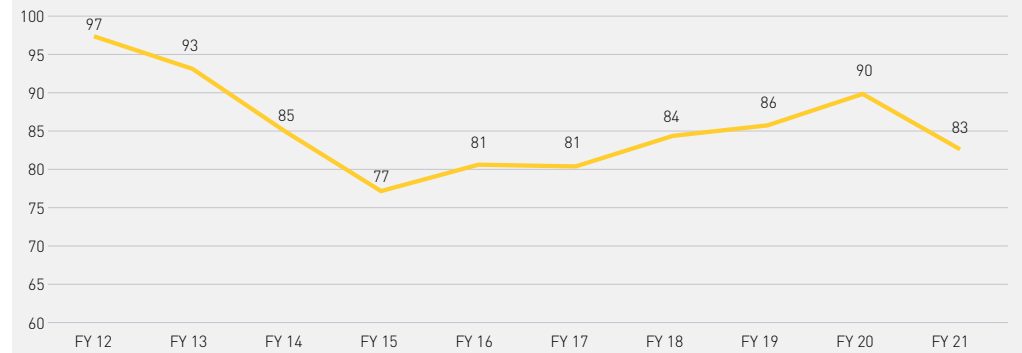


\*The objective track line represents the ideal path to our 55% reduction at the time the objective was set to the 2030 goal. More information will be provide as project plans are solidified to get back on track.

## Wastewater Discharge

We are working to minimize our wastewater discharge. While we haven't yet set an objective in this area, we will look to include it once the current efforts are further developed.

### Wastewater Treated (lbs/pCWT)



## Future Progress

We are looking to work with The Water Footprinting Network, an organization that expands expectations for mitigating water use beyond the boundary of a company's business units. This includes the water table, social sustainability and impacts on and mitigation of ecosystem services. We know we must seek this advice to adapt to climate change, especially working in agricultural activities. Over the coming years, we plan to complete a Water Footprint Assessment to assist the development of our corporate water strategy and improve our water stewardship.

## Highlight Story: New Onsite Facility at Baltimore Refinery Treats 5.4 Acres of Stormwater

**O**ur Baltimore Refinery in Maryland is helping to clean stormwater before it reaches the city's harbor with the installation of a new modular wetland system. The system has a storage volume of more than 20,000 gallons and treats a combined 5.4 acres of impervious surface at a rate of one inch of rainfall per hour. The aboveground design of the structure is more compact, robust and easier to maintain than a traditional in-ground structure and is more practical and environmentally friendly.

The stormwater treatment facility is just the latest eco-friendly project at the Baltimore Refinery aimed at protecting the health of our local waterways. Since 2018, we have partnered with the



Chesapeake Bay Foundation, and our employees have been growing oysters on our dock to help filter the water of the Patapsco River. The oysters our employees have cared for are now filtering millions of gallons of water per day at a sanctuary reef downriver from the refinery.

## Highlight Story: New Projects Reduce Our Water Consumption at Crockett Refinery

**O**ur Crockett Refinery in northern California has made great progress in reducing its water consumption.

We completed a project to recirculate the water used in the refinery's rotoclones, which use high-speed fans and water to capture sugar particles in the air near packaging lines so they can be reprocessed. Previously, we used fresh water for this purpose, which went back to our low-purity system for remelt after it was used once. Now, we are recirculating sweet water from what is essentially a surge tank. Once the water in the tank reaches a predetermined Brix level, it bleeds off to reprocessing. We will save approximately 70,000 gallons of water per year by re-using the same volume of water.

The Process and Maintenance teams also completed a project to save water in the scum clarifier station. By installing a pipe to recirculate water from the output of the first scum clarifier stage back to the main clarifier's troughs, the refinery was able to stop using 72,000 gallons of fresh municipal water per day in the clarifier station when running at our optimal rate.



# Reducing Our Waste

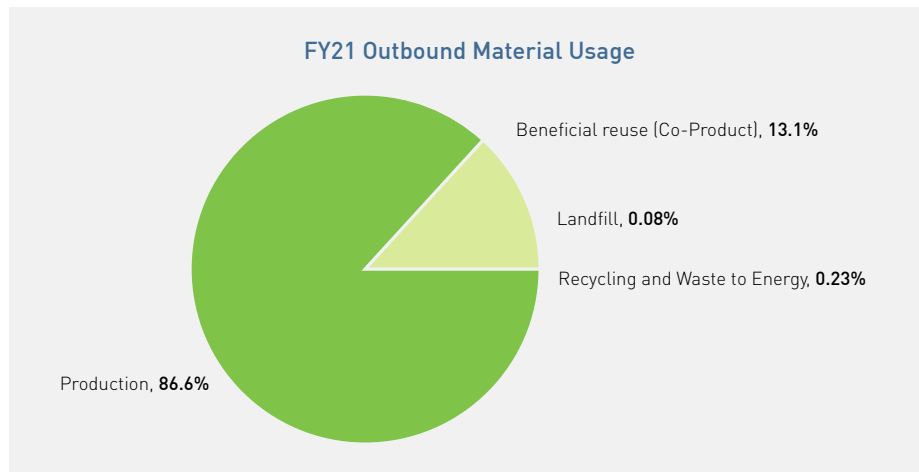
**We have achieved 99.5% diversion from landfill across our operations with a target of 100% by 2030.**

Only 0.08% of our waste is sent to landfill from our products, co-products, reuse pathways and recycling pathways.

We will go even further by minimizing our waste streams and maximizing our recycling, while ensuring our packaging and post-consumer materials are reusable, recyclable or compostable. We already monitor, recover and reuse our biomass, and the majority of our heat and water systems. But, we know there is always room for improvement. Our traditional waste streams are now viewed as by-products - all renewable and non-renewable materials will have a new life through reuse, repurposing, or recycling.

At the request of our stakeholders in the production and industrial sectors, we conducted a detailed analysis of our FY21 waste profile.

The waste we produce accounts for only 0.31% of our total yield. This waste is composed of materials directed to landfills or recycling. Our production accounts for 86.6% of our outbound materials, while beneficial reuse or co-product pathways make up the remaining 13.1%. This segmentation is depicted in the following graphic:



# Reducing Our Waste

In many cases, further reducing our waste requires collaboration with local area service providers as well as improvements to the local, regional, and national waste infrastructure. Through collaboration with our waste management providers, we are working to gain better visibility on bulk waste contributions such as mixed commercial industrial waste.

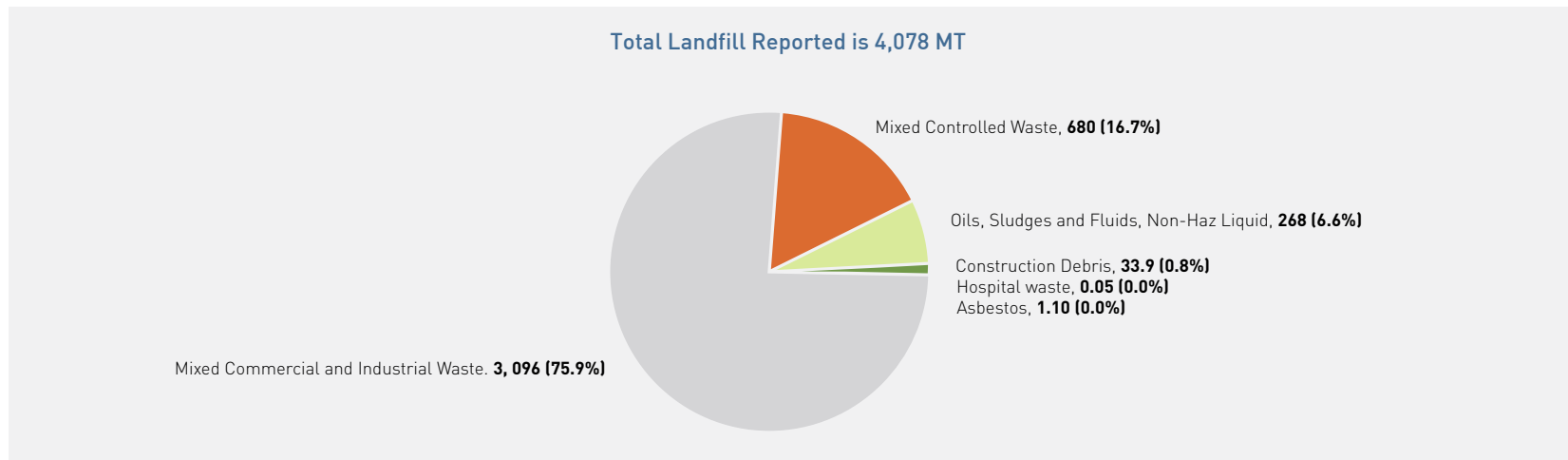
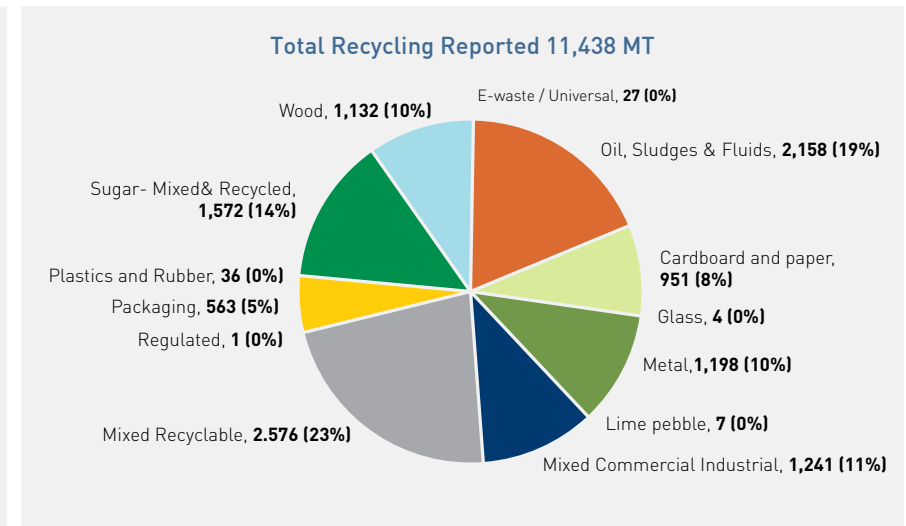
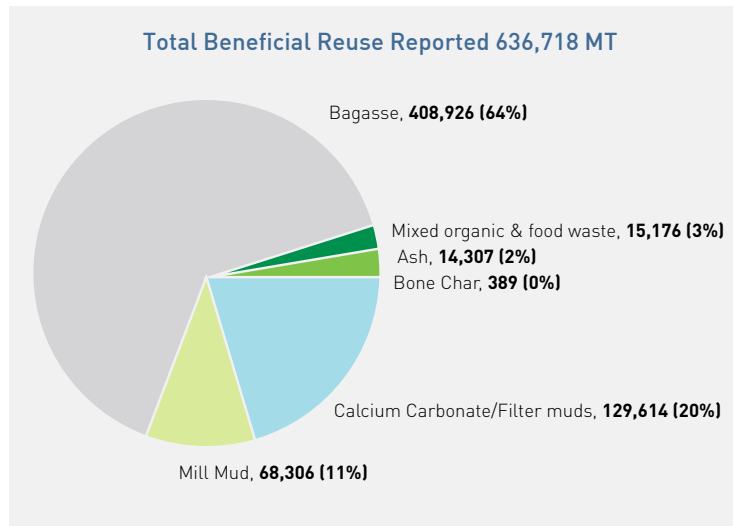
Our approach will divert landfill disposals toward recycling pathways, while reducing both recycling losses and landfill losses.

Our data has been improving in granularity, through collaboration with our waste management providers since our initial efforts began with a focus on recycling in 2012. The following graphics display the FY21 results of our beneficial reuse pathways, recycling, and landfill losses.

## Solid Waste – Wasted Resource Minimization

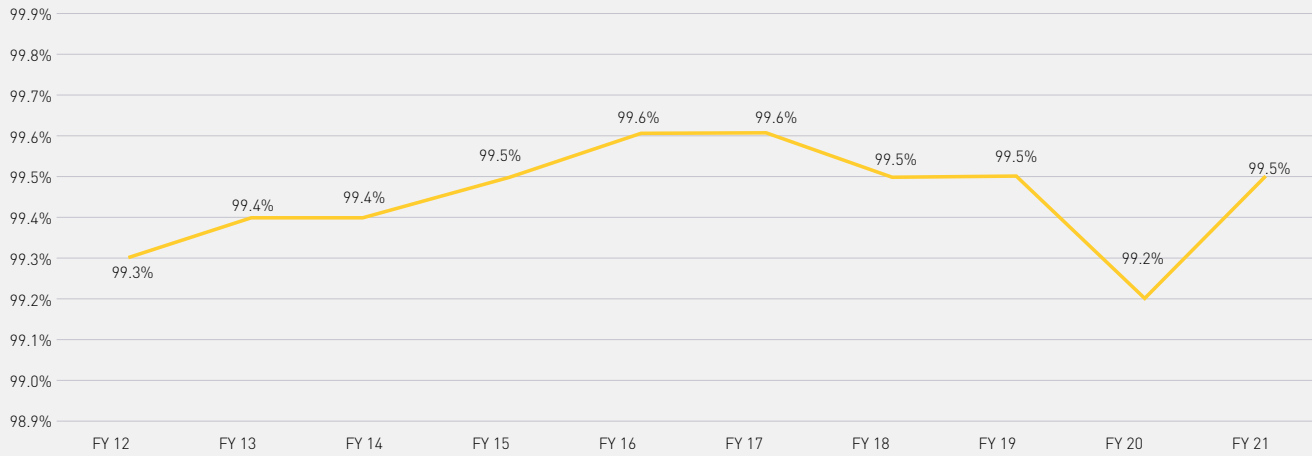
We aim to reduce our total solid waste stream, normalized to production<sup>5</sup> by 25% by 2030 when compared to FY21, while still pursuing and maintaining our zero-waste-to-landfill accomplishments.

<sup>5</sup> Excluding land applied/beneficial reuse muds and ash.

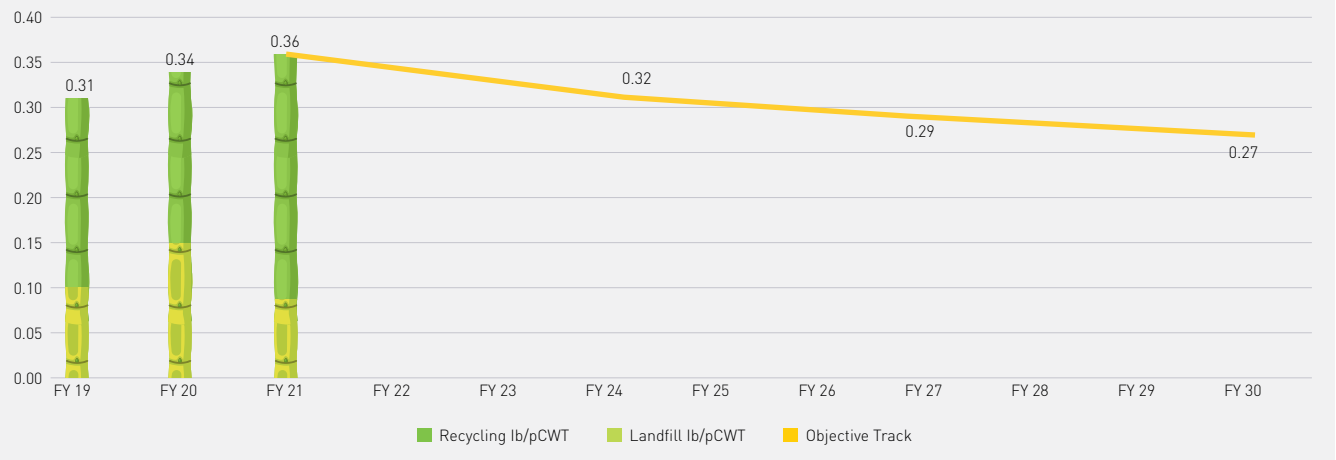


# Company-Wide Recycling and Waste Effort

### Percent Diverted from Landfill



### Total Solid Waste (Recycling and Landfill)



## Highlight Story: Employee-Led Committee Reduces Waste in Belleville

A Sustainability Committee at the Belleville Plant in Canada is helping the facility achieve its waste reduction goals while increasing the plant's overall efficiency. The plant's waste diversion rate (the percentage of recoverable waste removed from its solid waste stream) was close to 95% in FY20, well above Ontario's target of 60%. The Sustainability Committee hopes to play a key role in further improving this through projects like increasing recycling in the cafeteria.

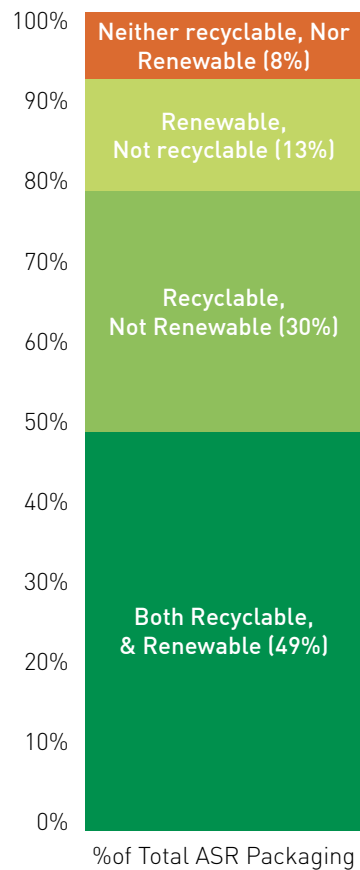
To deepen its impact, the committee is developing training and producing cards for cafeteria tables so that everyone knows which waste items go in which receptacles. They are also ensuring workers segregate damaged raw material so it can be sent for recycling by a local food-recovery company rather than put into the garbage.



Outside of the committee, the Belleville Plant continues to make investments in waste reduction. Most recently, a new Kraft bag baler, and operator trainings emphasizing the importance of recycling, has reduced the volume of Kraft bags that enter the non-recyclable solid waste pathway.

# Reducing Our Packaging

Through the packaging sustainability program launched in FY18, we have pursued the sustainability of our products against the following three (3) pillars:



## 1. Sustainable Packaging:

This initiative aims to ensure that 100% of packaging will be reusable, recyclable or renewable by 2035, with faster timelines in some regions.

We are pleased to report that as of the close of FY21, 91% of our packaging by weight met this assessment across the United States, Canada, and Europe.

In FY21, we introduced how2recycle<sup>®</sup> labeling on our new graphics for our Florida Crystals<sup>®</sup> and Domino<sup>®</sup> packaging in the US, as well as an on-pack recycling label (OPRL) for our Tate & Lyle<sup>®</sup> packaging in the United Kingdom.



We are developing the following initiatives to advance our packaging sustainability program:

Initiative	Estimated Result	Impacted Regions
Plastic Elimination for Large Paper Bags	5,400 MT Converted from Non-Recyclable to Recyclable	United States, Canada, and United Kingdom
PCR <sup>6</sup> for PET <sup>7</sup> Plastic	Introduction of 211 MT of PCR content (Average 25%)	United States, and United Kingdom
Retail Plastic Bag Structure Change	106 MT Converted from Non-Recyclable to Recyclable	United Kingdom

<sup>6</sup> PCR: Post-consumer recycled

<sup>7</sup> PET: Polyethylene terephthalate



# Reducing Our Packaging

## 2. Material Reduction:

Packaging represents only 2.8% of the net weight of our products, which is very low compared to other categories in the food industry. Nevertheless, we continue to look for thinner, lighter, stronger materials to limit/reduce packaging use and waste.

We expanded our Single Ply Paper Bag initiative across our brands: Introducing high-performance paper to the 2 lb, 4 lb, and 5 lb granulated sugar bags, resulting in a 25% reduction in paper consumption and post-consumer impacts (overall paper reduction of 344 MT in 2021). We plan to further expand this initiative to our 10 lb granulated sugar offering, generating an additional paper reduction of 204 MT<sup>8</sup>.

In 2021, we also launched our Retail Poly Bag Down-Gauge initiative: Reducing the plastic in our bags for the 500g - 2kg brown sugar bags, resulting in a 10% reduction in plastic consumption. We expect this to result in plastic reduction of around 10 MT in 2022 (based on FY21 volumes).



## 3. Minimize Carbon Footprint:

To reduce our CO<sub>2</sub> emissions and energy consumption we continue to identify opportunities to improve our inbound supply chain and implement innovative packaging production processes.

Government-mandated programs in countries like Canada and the United Kingdom require producers to pay for the waste handling of their packaging, so we know we must focus on the post-consumer impact in the coming years.

<sup>8</sup>Estimation based on our 2021 usage

## Highlight Story: Sustainable Conversion of 4 lb Bags to Single-ply Packaging Saves 600,000 Pounds of Paper a Year

Our conversion from double-ply to single-ply packaging paper for our 4 lb bags of Domino®, C&H® and Redpath® granulated sugar in the United States and Canada has reduced our paper use by more than 600,000 pounds a year. The change was made possible by identifying the right packaging paper and replacing and modifying packaging lines' paper infeeds, which are pieces of equipment that take the packaging paper off the giant roll, slit the paper for folding and apply glue.

“This project tells a good story for us as a company,” said Senior Director of Packaging Operations Sean Garry. “We have good machinery and, using proven technology, we will boost efficiency and make a huge impact.”



## Highlight Story: Working Towards 100% Recycled or Renewable Retail Packaging

**93%** of our retail packaging is already recyclable, and we strive to find the right solutions for the rest. The switch from a plastic sleeve label to a paper label on a Lyle's Golden Syrup bottle for the retail sales channel is an example of a recent success. The previous label wasn't recyclable and required heat to be applied to shrink it in place. The new paper label requires less energy to apply and means the bottle is now fully recyclable by household curbside collection.

The plastic film used for retail brown sugar bags is more of a challenge; while most white sugars are sold in paper, the moisture content of brown sugars means plastic is the most practical packaging solution. We have been looking for more environmentally friendly alternatives, however regulations governing materials in contact with food can restrict options and, while some materials are technically recyclable, there are few schemes that achieve this in practice. We are working with suppliers to make the right decisions for the environment and our consumers.

**We are working hard to reach 100% recycled or renewable retail packaging by 2035 (or sooner).**



## Highlight Story: New Recycling Labels on Our Packaging Aid Consumers

**N**ew recycling labels on select consumer products, as well as much of our foodservice packaging in the United States, Canada and the United Kingdom, are helping consumers recycle our packaging.

The easy-to-read labels, designed and certified by non-profit organizations, provide important recycling information, such as any additional steps required before recycling, if the packaging is widely recycled, what it is made of and to which component of the packaging the label refers.



**“We look to continuously improve on the sustainability front, so much of our packaging already has a positive recycling story,”** said John Monroe, Director of Packaging Engineering, Research & Development. **“Helping our customers recycle is the right thing to do and consistent with our principles.”**

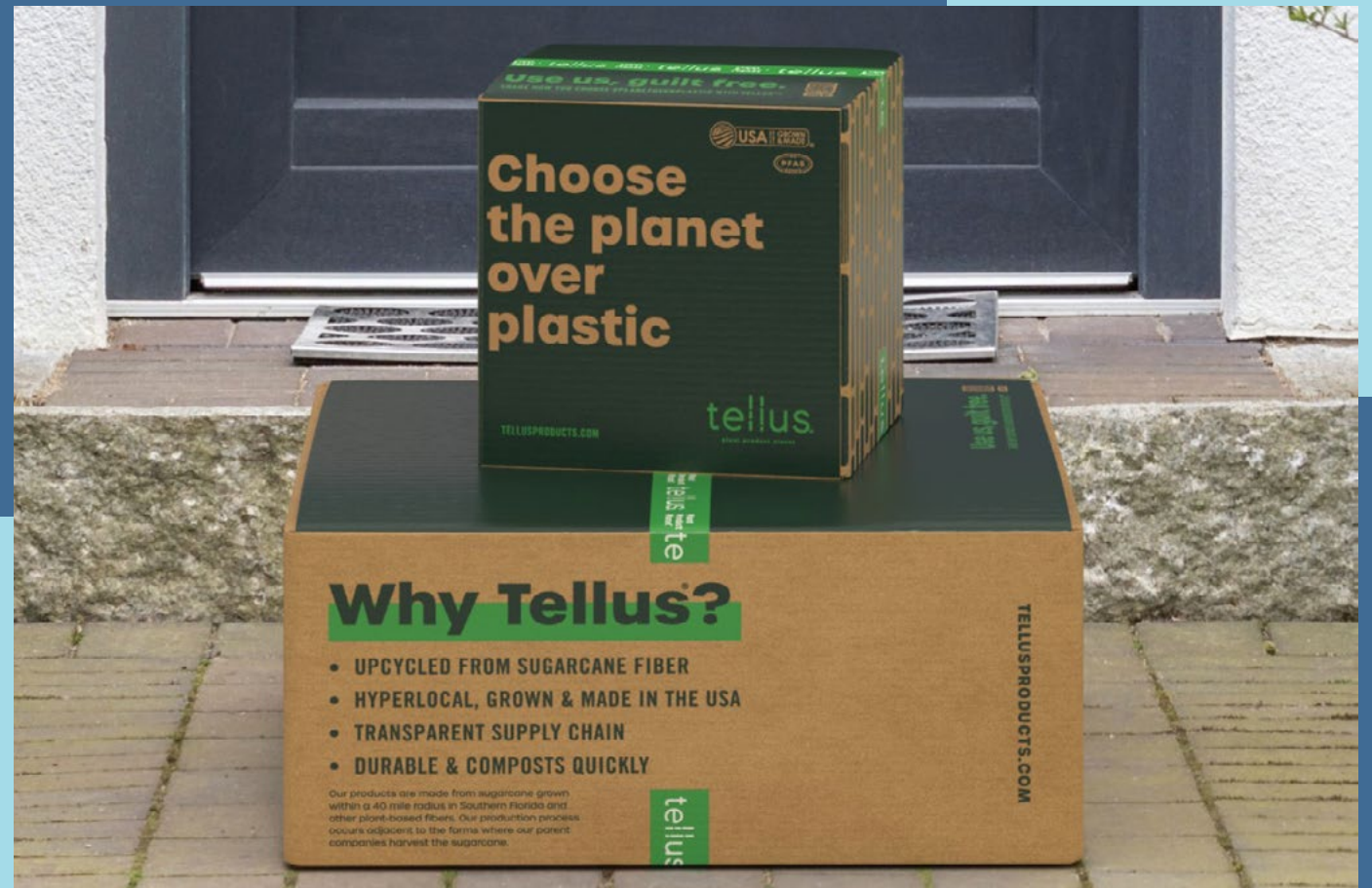
The recycling labels are available through our membership in two environmental non-profits, How2Recycle in the US and Canada, and On-Pack Recycling Label LTD (OPRL) in the UK. Companies send their product packaging to be assessed by the non-profit and may then use the special recycling label on their packaging.



## Highlight Story: Tellus Takes Our Sustainable Use of Sugarcane to the Next Level

In 2020, in the spirit of resource circularity, we made a strategic investment in Tellus Products, LLC, a sustainable company that is core to our cane sugar focus. In partnership with the sugarcane companies that own ASR Group, Tellus seeks to harness the power of sugarcane to combat the earth's plastic pollution problem by developing a more sustainable tableware product.

At its state-of-the-art manufacturing facility in Belle Glade, Florida, Tellus makes single-use, compostable tableware and foodservice products from plant fibers, mainly the excess bagasse (sugarcane fiber) not used to power our operations. We now provide 12 different varieties of bowls, plates and clamshells, all PFAS<sup>9</sup>-free and compostable. We are extremely proud of the positive impact Tellus has made on our local communities and our planet.



<sup>9</sup> Perfluoroalkyl and polyfluoroalkyl substances



# SUSTAINABLE AGRICULTURE

We are committed to implementing the most innovative ecological practices.

# Our Sustainable Agriculture Approach

## Our products come from the earth and are returned to the earth.

Our business grows from one of the Earth's most environmentally friendly crops. Sugarcane is a perennial grass and regrows for many years in its crop cycle, which means once the roots take hold, they stabilize and conserve soil over many years, unlike crops that require annual land preparation. Importantly, sugarcane also captures and stores carbon in the soil.

We buy raw sugar from mills all over the world that source their own cane from different types of farms; and we also farm our own sugarcane to supply our mills in Belize and Mexico. As farmers across the world have known for generations, taking care of the land and reducing environmental impact protects resources and reduces costs in the long term. On our own farms, we already go beyond standard industry best practice but we aspire to do more.

Where we have direct control of our farmland, we will invest and innovate, and where we have indirect influence, we will share knowledge to support and empower our partners to make the same necessary changes. We will continue to adopt best practices to care for our land and surrounding ecosystems and will empower suppliers to adopt farming practices that do the same.

For our operations in Belize and Mexico, we are currently focusing on five key areas that will evolve as our understanding and practice develops:



**Land Use Change and Forest Preservation**



**Regenerative Agriculture**



**Sugarcane Planting, Variety Diversification, Cover Crop and Crop Rotation**



**Agricultural Land Biodiversity**



**Local Farmer Engagement, Education and Capacity Building**

As these programs mature, our objectives and targets will be established and shared in future reports. Some of our recent efforts include integrated pest management, "climate-smart" sugarcane varieties, owl boxes, and capacity building for local farmers in collaboration with local NGOs.

As our work extends, we intend to measure, monitor and record soil carbon sequestration, and benefit from collaboration with well-defined Voluntary Carbon Credit markets, to provide tangible evidence for any future carbon mitigation claims we declare relative to our products.

## Highlight Story: Innovative Grant Program Readies Farmers in Belize for Climate Change Impacts

**W**orking together with sugar industry stakeholders and the Caribbean Community Climate Change Center, we developed an innovative United Nations Green Climate Fund grant program worth \$10 million that will help small farmers in Northern Belize meet the immense challenges posed by climate change.

The program, called “Building the Adaptive Capacity of Sugarcane Farmers in Northern Belize”, has a five-year timeline and aims to improve crop diversity and farming practices to reduce climate risk and GHG emissions. It will also strengthen farmers’ adaptive capacity. The goal is to increase promising and resilient sugarcane varieties that will better tolerate climate extremes and allow farmers to replant damaged fields. We aim to scale up leading commercial varieties, which can take decades to



develop, and roll out seed supply to farmers in a timely manner. The Green Climate Fund project, endorsed by the Government of Belize, also focuses on water management, including identifying available water sources for irrigation, complemented with best practices for pest management and soil conservation. Additionally, the plan investigates ways agriculture can reduce carbon emissions.





# SUSTAINABLE AND ETHICAL SUPPLY CHAIN

We have a duty to protect both our natural assets and the diverse communities that farm, mill and refine cane sugar all over the world.

# Our Raw Sugar Ethical Sourcing Process

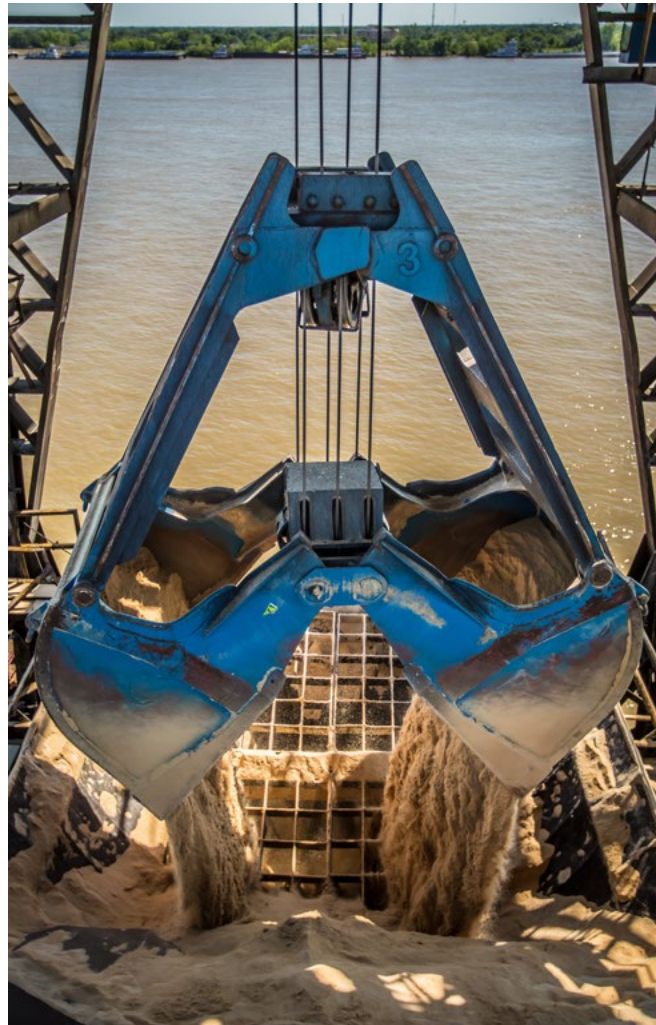
**We aim to achieve 95% sustainably sourced raw sugar goal by 2035.**

So far, our Redpath Sugar operation in Canada and Sidul Açucares in Portugal have already achieved 100% sustainably sourced raw sugar.

We are also expanding our ethical sourcing efforts to other supply chains beyond raw sugar.

Social responsibility is at the core of what we do. As the leading cane sugar refiner in the world, we recognize our potential social and environmental impact. We are striving to make sure all processes throughout our supply chain are conducted ethically and sustainably, with people and planet in mind.

To hold ourselves accountable to this, we make our Ethical Sourcing Policy, Code of Ethics and Business Conduct, and Supplier Code of Conduct publicly available on our [website](#) and require our own and our suppliers' operations to undergo third-party social audits to understand and address any health, safety, environmental, labor, and human rights issues. The following sections provide further detail on how we establish an ethically responsible and environmentally sustainable supply chain.



**Our goal is to only refine sustainably and ethically sourced raw sugar globally.**

Many of the sugar-producing countries where we buy raw sugar are developing countries. These often have challenges in common, such as widespread poverty, low education levels and little or no social support for vulnerable people. The sugar industries in the countries that supply us are often the backbone of the local communities and play a significant role in the local economies. We recognize that buying from sugar-producing companies in developing countries brings specific risks and responsibilities. As a major buyer of raw sugar, we strive to use our scale to eliminate unethical practices while building capacity at the local level to support these communities.

Our Sustainably Sourced and Ethically Grown commitment means we aim to ensure our raw sugar comes from suppliers who are independently assessed by third-party experts against reputable, internationally recognized social standards to verify they are upholding our values.

Every step of the way, we have an opportunity to make a positive impact.

# Ethical Sourcing Criteria

Adopted 11 years ago, our ethical sourcing process focuses primarily on our raw sugar supply chain; although, we are now starting to expand our efforts to other supply chains. This process involves various components to ensure our third-party raw sugar suppliers comply with adequate ethical and environmental standards.

- All our raw sugar suppliers are required to adhere to our Ethical Sourcing Policy and Supplier Code of Conduct. These policies are based on International Labor Organization (ILO) standards and international conventions on child labor, modern slavery, land use, environmental protection, and others.
- Suppliers are asked to complete self-assessment questionnaires (SAQs) annually using the Supplier Ethical Data Exchange (Sedex) [platform](#) to evaluate their compliance with our Ethical Sourcing Policy. Sedex provides an electronic system for collecting and analyzing information on ethical and responsible practices along supply chains.
- We encourage certification against internationally recognized social and environmental standards such as ProTerra, Bonsucro, SAI, and Fairtrade. Many of our suppliers are independently audited against ProTerra, a standard that seeks to address the main challenges linked to agricultural production in developing countries. We strive for all our raw sugar suppliers to be assessed against an internationally recognized certification scheme and a further objective will be that all become certified.

Raw sugar is considered “sustainably sourced” if it meets one of the following:

- Has been certified by Bonsucro, Proterra or Fairtrade and all chain of custody requirements have been fulfilled.
- FSA or any standard benchmarked by FSA in conjunction with an audit report of the mill dated within the prior 12 months against the SMETA (4 pillar) standard.
- The supplying mill has been assessed against the Proterra Verification audit. This sugar will be paired with Bonsucro credits. We aim to minimize the use of this rule where this is reasonably feasible, practically and commercially.

## RAW SUGAR SUPPLIERS SCALE RISK ASSESSMENT



- % indicates total number of suppliers that fall under each of the different levels of compliance.
- 1-5 scale represents overall degree of compliance concerning critical risk factors.
- 5 denotes the highest level of compliance.

# Remediation and Support

Our social auditing program provides insight on the risks in our raw sugar supply chain, allowing us to define our remediation efforts accordingly. Suppliers found to be non-compliant with social and environmental audit criteria are required to submit a Corrective Action Plan (CAP) with a specific timeline for completion. We ask suppliers to examine the root cause of non-compliances and to assign a team responsible for implementing corrective action. We maintain continuous contact with suppliers to ensure non-compliances are resolved within the proposed timeline.

To tackle some of the challenges that we face in building an ethical and resilient supply chain, we collaborate with financial institutions and non-governmental organizations, such as the Inter-American Development Bank and the Fairtrade Foundation, as well as our direct customers.

Over the past three years, we've introduced programs in Mexico, Belize, and the Philippines, with the help of some of our customers, to promote agricultural best management practices, prevent and eradicate forced and child labor, foster health and safety in the workplace, and offer financial support to the communities we operate in.

Some of these projects include the:

- “Learn to Grow” program in Belize and Mexico with The Hershey Co.
- Development of easy-to-use contracts on independent smallholder sugarcane farms in Northern Belize, supported by The Co-op
- Responsible Sourcing from Small Landholders in the Philippines Sugar Sector with Nestrade S.A. (Nestlé) and Proforest Ltd.

All of these programs are aimed at enhancing sustainability and supporting the livelihoods of small landholders in the sugarcane industry. These programs, as well as projects run by smallholders in Belize funded by us through Fairtrade, are detailed next.



## Highlight Story: Learn to Grow

In FY17, we partnered with The Hershey Co. to launch the “Learn to Grow” program, aimed at improving the livelihoods of rural sugarcane farmers. This led to the creation of the Cane Quality program in FY18 in Belize, and FY19 in Mexico, aiming to improve cane quality, sugar yields and farmer well-being. The programs grew significantly over the years, impacting more than 5,000 farmers from FY19 to FY21.

In Belize, from FY19 to FY20, we helped 5,000 farmers, providing training on sustainable agriculture practices and how to reduce the impacts of drought. We introduced local farmers to soil sampling and sugar quality testing technologies, as well as historical harvest data to help better manage their soils. We supplied personal protective



equipment (PPE) for manual harvesting as well as tree seedlings for local reforestation programs in their farms. As a result of the improved sugarcane quality achieved, farmers saw a benefit estimated, in total, equal to US\$1.4 million in revenue from their cane.

## Highlight Story: Learn to Grow, cont.

Following a drought in FY20, a new three-year Climate Smart Sugarcane Project began in Belize in FY21, with the focus on monitoring, identifying, and mitigating sugarcane pests as well as drought impacts. By its conclusion, the project aims to improve the ability of more than 2,500 cane farmers to respond to erratic weather conditions and related issues. The data collected throughout the project will be uploaded to the Farmers Alert App for Pests and Weather, currently under development, to equip farmers with easily accessible data on weather patterns, pest incidences, topography, soil types, cane quality, and cane parcel information. In FY21, the project helped almost 2,000 farmers in training sessions and through soil data collection. So far, the project has saved farmers nearly US\$30,000 and 6,400 kg of chemicals by applying biological pest control to about 500 hectares of sugarcane.



In Mexico, from FY19 to FY21, several thousand small farmers benefitted from training on improving field sampling and socially responsible harvesting practices. The main focus of this project was to reduce excess material, such as tops, leaves, and soils, left on the cane after harvesting. We created a database to capture cane quality samples taken during the project, tracking the progress over the years. By FY21, we had provided training and sampled cane quality data for more than 200 harvesting groups, all of which saw significant improvements over their proportion of excess material on the cane.

## Highlight Story: Responsible Sourcing from Small Landholders in the Philippines Sugar Sector (RSS)

In FY18, we became a funding partner, along with Nestlé and Proforest Ltd. (“Proforest”) of a multi-stakeholder initiative called Responsible Sourcing from Small Landholders in the Philippines Sugar Sector (RSS) to address sustainability risks and livelihood needs of sugarcane smallholders in the Philippines province of Negros Occidental; the largest sugar-producing region in the country. The project receives funding from ASR Group, Nestlé, and in-kind contribution from some local stakeholders. The Philippines Sugar Industry Foundation, Inc. (SIFI) is the program coordinator and implements it with three sugar mills: Hawaiian-Philippine Company, Victorias Milling Corporation and Lopez Sugar Corporation, who also provide counterpart funding. RSS was introduced to address child labor risks, use of personal protective equipment (PPE), agricultural best management practices (handling of cane residue, cane harvesting, and soil management), and alternative livelihood support and income diversification.

In FY19 and FY20, the Comprehensive Assistance for Small Holders for Farm Productivity (CASH) and the PAGSIK Incentives Program were respectively launched in the RSS Program, to address agricultural best management practices and livelihood support. The CASH project helps cane farmers increase their yields by providing them with training and support on agricultural management and monitoring. The PAGSIK Program supports food security and income diversification for cane farmers by providing them with financial and technical assistance to establish their own vegetable gardens - offering essential assistance to farmers during the pandemic.

In FY21, the Integrated ARBO Child Labor and PPE Program and Services (IACAP) program began offering Agrarian Reform Beneficiary Organizations (ARBO) resources and strategies to reduce instances of child labor and promote proper use of Personal Protective Equipment (PPE). Project highlights include raising community awareness



Giving of incentives to CASH ARBOs (GARC, HABARC, DEARCO, & HAVIDWA) for 100% Trash Farming



NARC water eggplant in nursery ready for transplanting



Soil fertility session in Hacienda Virgen 2 Duplex Worker’s Association or HAVIDWA 2019

on child rights and the hazards of child labor, the creation of a communal vegetable garden for ARBO members and their children and a partnership with the local Carlos Hilado Memorial State University (CHMSU) to work on PPE use and innovation in PPE design, as well as ARBO training and mentoring.

Though the COVID-19 pandemic did slow the program’s progress, by the end of FY21, it grew to positively impact directly and indirectly the lives of more than 4,000 sugarcane farmers from 93 ARBOs, which make up about 70% of all small farmers (less than 10 hectares of land) in the North Negros Occidental region. The RSS project will build on its past success to continue supporting the livelihoods of sugarcane growers in the region.

Photo credits: [proforest](#)

## Highlight Story: Contracts for Seasonal Sugarcane Harvesters in Northern Belize

The project, which was part funded by UK retailer Co-op and supported by BSI, aimed to formalize hiring and working practices in the smallholder cane farming sector during harvesting. It did this by developing and piloting written contracts, to enable employers and employees in cane farms to replace word of mouth agreements. Cane farming in Northern Belize employs large numbers of seasonal workers, particularly during the harvest. Before this project, they would typically work without written contracts, training or systematic provision for their safety at work.

The target group for this project was approximately 2,640 cane cutters and 264 reaping group leaders (their managers/employers) in the North of Belize.

As part of their due diligence under the UK Modern Slavery Act, Tate & Lyle Sugars arranged, in 2019, for 80 stakeholders from the Belize sugar industry (farmers, reaping group leaders, farmers' associations, employees of the mill and members of the government) to take part in training run by the International Labor Organization (ILO) on forced labor risk indicators. Following the training, cane cutters and reaping group leaders identified two key priorities: the hiring process and health and safety. They proposed employment contracts and the provision of health and safety training and personal protection equipment (PPE) as potential solutions to forced labor risks.

The contracts formalized the previously informal agreements and practices, and are mutually beneficial to both the employees and employers.

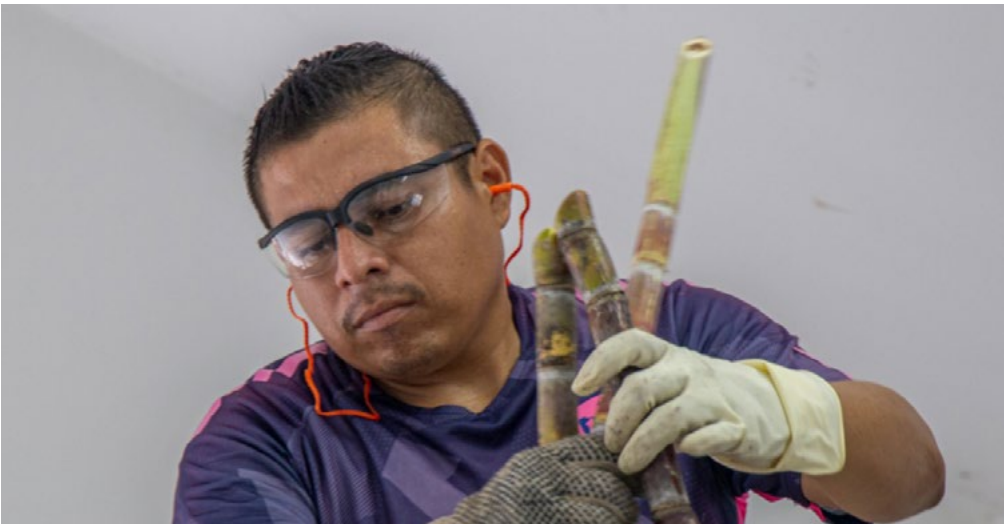


The contracts are a primary tool in improving the understanding of reaping group leaders of all of their obligations. This was supported by training from Social Security and Labor departments on Belize employment law. Contracts with workers are now mandatory under Fairtrade standards, which underpins their ongoing use and will benefit workers across the wider sugarcane industry in Belize.

As part of the project, gloves, protective eyewear and shin guards were distributed free to reaping group leaders using the contract, which incentivized the roll-out of the contract and facilitated compliance. The PPE was popular with cutters, and anecdotal accounts suggest it has already reduced injuries.



# Our Fairtrade Commitments



**Since 2008, we have supported small-scale farmers through Fairtrade, generating more than US\$65 million in Fairtrade Premiums, more than any other sugar company.**

Under the Fairtrade system, certified small producer organizations decide democratically how to spend the premiums generated from the sale of their produce. Our Fairtrade commitment has generated premium funds that have enhanced productivity and improved livelihoods, improved living and working conditions, protected communities from child and forced labor, and promoted education, better healthcare and gender equality in cane farming communities. Cane growers supplying our mill in Belize and many cane farmers in our supply chain in Eswatini, Fiji and Paraguay are members of Fairtrade-certified producer organizations.

The four sugarcane producer associations that supply our operations in Belize engaged in several initiatives from FY19 to FY21. Projects included improving on-farm productivity, women and youth empowerment, worker health and safety - particularly during COVID-19 -, child labor and raising awareness about gender-based violence.

## Highlight Story: A Gender and Youth-Based Project to Improving Livelihoods through Climate-Smart Agriculture

**P**rogressive Sugar Cane Producers Association (PSCPA), who represent 624 farmers, have built on the foundations of their Fairtrade status to attract additional funding and expand their capacity to deliver livelihood promoting projects for their community; mitigating risks of child labor and gender-based violence.

In February 2020, with support from the UN Development Program, Australian Aid, and the Green Energy Fund Small Grants Program, PSCPA embarked on a project called “Engaging Youths in Climate Resilient Sustainable Agro-Ecological Practices within the Northern Landscape.” The purpose of this program was to teach vulnerable young men and women to create bio-fertilizers, transplant seedlings, and build greenhouses so that they could start their own small businesses. The program aimed to help participants become confident decision-makers and leaders in their homes and communities, and included modules on financial literacy, self-esteem, decision-making skills, access to information and resources. Economic empowerment is central to the participants’ ability to overcome poverty and improve their well-being.

Phase 1 was completed on July 30th 2020 with the successful harvest of both a variety of organic fresh produce and enthusiastic and empowered young people. A second phase of the project, with a new cohort of trainees, began in November 2021.

PSCPA has launched complimentary projects funded by Fairtrade Premium to build skills and income diversification for its members. These include:



- Provision of chicks to 59 vulnerable households to increase food security.
- Promotion of organic farming and holistic production systems that avoid the use of synthetic chemical and fertilizer in favor of organic materials.
- Microbial fertilizers and biological control pesticides to improve soil health and to increase yield in horticulture production.

## Highlight Story: Eliminating Child Labor: Lessons Learned from Belize's Sugarcane Sector

**O**ur ethical sourcing policy prohibits child labor. However, it remains the case that many cases of child labor globally are found in the agricultural sector; and the same applies to sugarcane production.

We have been pleased to support Fairtrade's comprehensive program to eradicate child labor. It includes relevant standards for small producer organizations. It provides protection policies for children and vulnerable adults when the worst forms of child labor, forced labor and/or gender-based violence are detected. Fairtrade also prevents child labor by tackling its root causes. One such project is the Youth Inclusive Community Based Monitoring and Remediation System. This approach is led by the producer organization, farmers, farm workers and their families. It also scales up to involve supply chain actors and finally government.

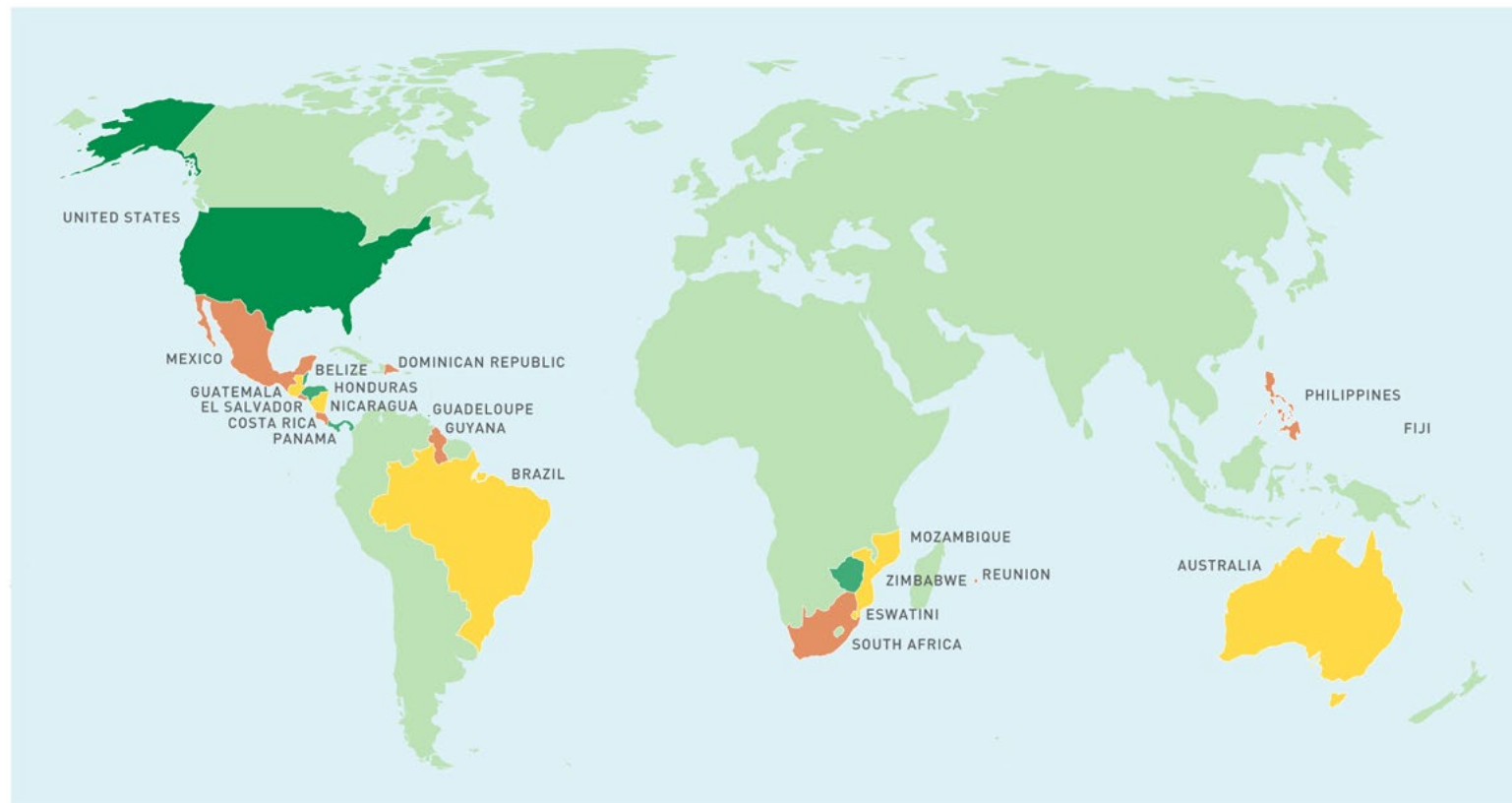
In the case of Belize's sugarcane sector, Fairtrade-certified producer organizations have promoted social dialogue among farmers, farm workers and their families, including children, youth, women and migrants. The sugar industry in Northern Belize has collectively and publicly called upon the government to rigorously enforce its child labor standards in the sugarcane sector. Since this work began in 2015, the number of reported



incidents of child labor has decreased. The work in Belize shows that progress can be made when small producer organizations and involved youth join together to lead the fight against child labor. The Government has recently recommitted to end child labor in Belize by 2025 and to introduce the new Child Labor Policy and Strategy for 2022-2025.

# Transparency and Traceability

We source raw cane sugar from more than 40 countries around the world. The US Department of Agriculture (USDA) regulates the US raw sugar supply under a tariff-rate quota (TRQ) system, while the Common Agricultural Policy governs the European Union (EU) raw sugar supply, and the UK Government determines its access to the UK. These regulations determine which countries we can source sugar from and how much. Since our FY18 Sustainability Report, we have publicly shared our supplying countries seen in the map below.




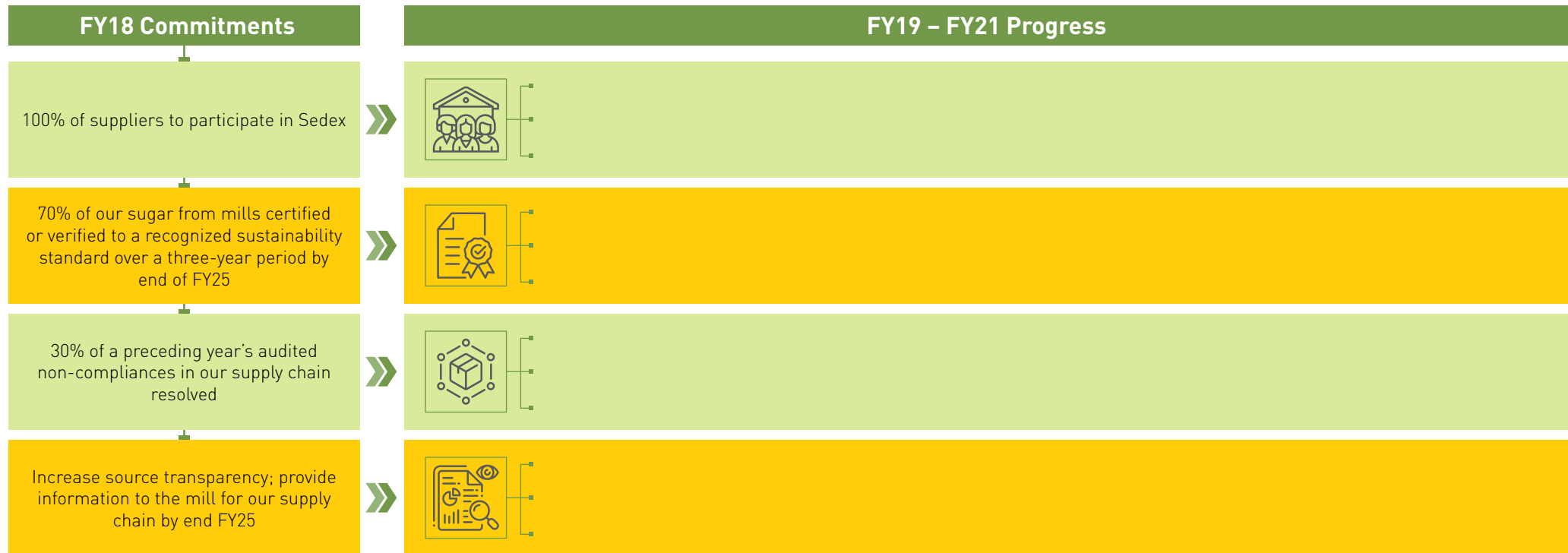
Along with disclosing the location of our suppliers, we report our social responsibility and sustainability efforts via select web-based platforms such as EcoVadis, The Sustainability Consortium's Survey tools, and the Carbon Disclosure Project (CDP). We assess the environmental and social performance of our operations and that of our suppliers through these platforms. The complexity of our supply chain makes it challenging to include every supplier and sub-contractor down to the mill level in our reporting. But, we continue to increase transparency and traceability across our supply chain by engaging the stakeholders and organizations involved.

# Our Commitments and Progress

We have made significant progress toward our commitments since our last Sustainability Report and have set the new goals below.

Due to COVID-19, the amount of third-party social audits decreased. However, the volume of raw sugar assessed continued to increase due to the number of mills already in our three-year rolling basis program.

click each FY 



## To reach our targets, we will continue:

- Communicating the need to participate in Sedex with our suppliers
- Expanding our audit program
- Making our audit follow-up measures more robust so that non-compliance incidents are rectified
- Exploring the enhancement of traceability of our supply chain

# Our Commitments and Progress

Along with the above annual commitments, we have ongoing commitments to uphold human rights and land rights, and to reduce, mitigate, and advocate for environmental impacts.



## Human Rights

We support the United Nations' Guiding Principles on Business and Human Rights. More than that, we have a responsibility to use our leverage to ensure human rights are respected throughout our supply chain.

This principle is reflected in legislation, such as the UK Modern Slavery Act and the 1930 US Tariff Act to which different parts of our operations are subject. A copy of our UK business unit's annual Modern Slavery Act Transparency progress statement ("MSATS") can be found [here](#).

## Land Rights

We respect the land rights of all local and indigenous people and communities in the areas where we operate. So, we engage in the process of free, prior, and informed consent (FPIC) for any agricultural development on land such individuals or communities legally possess.

We believe land rights disputes should be resolved in a fair and transparent dispute-resolution process. We require that all our suppliers also abide by our land-rights policy.

## Advocacy

We act as an advocate for sustainability by collaborating with various organizations, institutions, and projects in the cane sugar industry. For example, we have been working with sugar trading houses to incorporate sustainability into their purchasing decisions.

We continue to partner with international financial institutions, such as the Inter-American Development Bank, and are pursuing new partnerships with projects related to renewable energy and climate-smart agriculture.

## Highlight Story: Sidul<sup>®</sup> and Redpath<sup>®</sup> Commit to Sustainable Sourcing

In 2020, we were pleased to inform consumers that all of the raw cane sugar we procure for both our Lisbon and Toronto refineries is now sustainably sourced. Our pledge means that all of the sugar we produce in Lisbon and Toronto meets the following criteria:

- We maximize the volume of sugar procured from mills that are certified against an internationally recognized sustainability standard such as Bonsucro, ProTerra or Fairtrade.
- If it is not possible to access enough certified sugar, we buy it from suppliers who have been through our Ethical Sourcing Program, matching the quantity of sugar with sustainable program credits, which help to reward good practice and fund impact projects in key origins.



## Highlight Story: Upholding Our Values: Strengthening Strategy to Eradicate Modern Slavery in Our Supply Chain

The UK's Modern Slavery Act of 2015 obliges companies that import commodities to publicly define the steps they are taking to reduce and manage the risk of forced labor in their supply chains. Since its passage, we have continued investing in initiatives to protect human rights in the communities where we source raw sugar. These include training on modern slavery for



supply chain managers and employees in the UK and Portugal. We ran a modern slavery event adapted to COVID-19 restrictions at the end of November 2020. We set up banners across our locations and provided management briefings via email for employees working remotely. Following the event, we engaged Stronger Together, an organization who worked with the UK Government to develop the Modern Slavery Act, to train 55 of our employees.



**“The training is comprehensive and comes straight from the experts,”** said Gaynor Powley, Senior Director of Human Resources, who led the training development and rollout. **“It teaches employees their roles and responsibilities with regard to preventing modern slavery and how to follow our new protection protocol to report suspected abuses through the proper channels in a way that does not compromise the safety of the individuals.”**



# Our Operations and Future Priorities



## Our Own Operations

All ASR Group-owned production sites (mills, refineries, packaging and distribution centers) undergo annual Sedex Members Ethical Trade Audits (SMETA).

We use the SMETA audit process to assess our approach to compliance with labor rights, health and safety, the environment, and business ethics, which we share with our customers.

They give us an Annual Report outlining compliance with the Sedex standard, as well as a Corrective Action Plan (CAP) Report with details, if any, to address non-compliances.

The SMETA is one of the most widely used social auditing procedures in the world, using social and ethical standards based on the Ethical Trading Initiative's (ETI) principles.

An independent auditing firm completes the audit to ensure objectivity.

We maintain consistent contact with our sites to implement the CAP, making sure they resolve all non-compliances promptly.

## Our Future Priorities

Looking forward, we aim to enhance our sugar-sourcing standards as well as our internal social auditing procedures to produce the most ethically and environmentally responsible sugar possible.

We are working to expand Bonsucro, ProTerra, and Fairtrade certification among our third-party suppliers, increase participation in annual Sedex audits among our own operations, assess our supply chains beyond raw sugar, and continue to develop initiatives that support communities in the countries where we source sugar.



# EMPLOYEE AND COMMUNITY ENGAGEMENT

We will be an employer of choice.

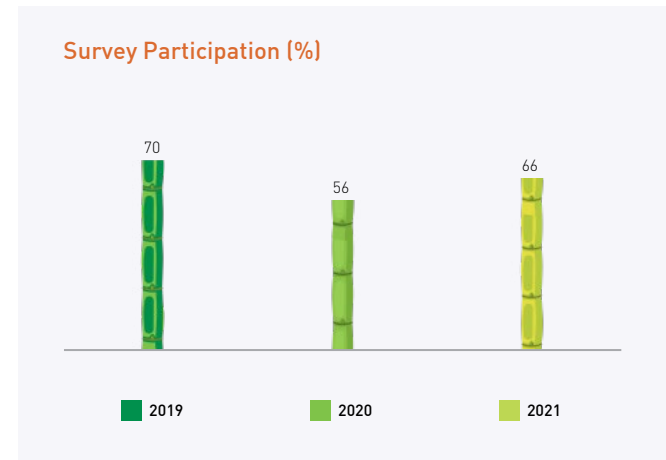
# Caring for Our People



Our commitment to be an employer of choice is a key part of our sustainability program. We aim to drive personal, professional, and economic growth alongside social responsibility and community involvement among our workforce.

In our anonymous annual engagement survey, we ask employees for feedback on how we can improve as an employer. We use this tool to develop and implement action plans that drive greater employee engagement.

Survey Participation (%)



# Health and Wellness

Our employee health benefits vary by region, but include incentives to complete annual physical check-ups, stop smoking, access counseling, free on-site health screenings for preventable, high-risk illnesses, mental health referral resources for employees and their family members, and free flu shots.



In FY19, on World Mental Health Day, our European operations launched a Mental Health First Aid program to provide training to managers on supporting mental health at work, share advice, and details for mental health support organizations. We currently have 19 Mental Health First Aid responders who meet quarterly to discuss new ways of engaging with the workforce on mental health topics.



Also in FY19, with support from the Inter-American Development Bank (IDB), we began an integrated program to raise awareness for the prevention of Chronic Kidney Disease (CKD) for our employees in Belize, offering screenings, education sessions, and taking operational measures to prevent illness resulting from exposure to heat stress and dehydration.



In FY20, as part of our COVID-19 response, we offered guidance on using Display Screen Equipment safely at home and training for managers on supervising remote teams to support our employees. In all our locations, we conducted internal COVID-19 awareness campaigns to emphasize the importance of following all health and safety protocols for workers to protect themselves, their co-workers, their families and others in the community.



In FY21, we introduced an annual leave purchase scheme in our UK operations to allow people to buy additional vacation days for greater flexibility. Employees can put forward a request to purchase up to five additional annual leave days.



#WeWillStopThisVirusTogether

## HOW CAN WE PROTECT OURSELVES AND OTHERS IF WE DON'T KNOW WHO IS INFECTED?

### GET VACCINATED

*Authorized COVID-19 vaccines can help protect you from COVID-19. You should get a COVID-19 vaccine when it is available to you.*



Practicing respiratory and hand hygiene is important at ALL times and is the best way to protect yourself and others.



Since some infected people may not have symptoms or their symptoms are mild, it is a good idea to keep a physical distance of at least 6 feet from other people.



Make wearing a mask a normal part of your interaction with other people. Use the mask correctly, covering the nose and mouth.



Even after getting vaccinated, the Ministry of Health and Wellness advises to continue following all health and safety protocols

Source: World Health Organization



# Health and Safety

## We will prioritize the safety and wellbeing of our employees.

We continue to emphasize Health and Safety of our employees as a core value and one of the fundamental pillars under which we operate. Through FY21, we saw a reduction in the global recordable injuries rate to 1.79. Continuing this trend of ongoing improvement puts us in a position to reach our FY30 goal to achieve a global recordability rate of under 1.0.

Looking forward, we will continue to focus our efforts on driving down recordable injuries, focusing on a comprehensive on-boarding training for all new employees across all locations. We will emphasize the importance of safety at all locations from day one and demonstrate our commitment to keeping our employees safe.

As we move out of the COVID-19 pandemic, we are continuing to look at better and more effective ways to train. The Learning Management System has provided a platform to track training data and reach a broader audience outside of our operations. We continue to use the safety contact process to further drive safety discussions at all levels and encourage peer-to-peer engagement on safety. We will continue to expand this management system approach in the upcoming years and look to certify sites in both ISO 14001 & ISO 45001. In addition, we will continue our Dust Hazard Assessments at all North American locations, expanding these assessments to all locations globally.



A significant highlight for FY21 was the commitment of many sites to partner with their local police and fire departments. We create a greater understanding of our sites for our local emergency responders



through these partnerships. This also helps to keep our employees safe by building a familiarity with the site in the event of an emergency.

Finally, all locations will once again plan to have safety celebrations and/or family days. These events bring together employees and their families, reinforcing the importance of safety in a way that reaches beyond employees to their families.

# Our Diversity and Inclusion Goals

We commit to being active and visible champions of diversity and inclusion, internally and externally at all levels of the organization. A diverse and inclusive workforce underpins any thriving business – and we are no different. Our people stay with us for a long time, and we want that to continue for generations to come.

Created in FY20, our Global Diversity and Inclusion Council helps us set and implement our commitments, goals, and priority actions throughout our operations around the world.

**We commit to breaking down barriers to effect change externally and internally and to being a bias disrupter, consciously challenging bias.**



## We have three diversity goals:



To increase diverse representation in our leadership population (Manager & above), working toward diverse representation across all levels in the organization.



To continuously improve our talent management processes to eliminate bias.



To strive to represent the diversity of the communities where we operate.

## We have two inclusion goals:



For each employee to feel valued, respected, and a consistent sense of belonging across the organization.



To create a culture where we actively seek out, engage with, and learn about the diverse identities and experiences of our colleagues.

## In order to achieve our goals we will:



Collect consistent data on representation and understand it.



Create employee-led resource groups that capture different areas of interest and/or identity groups.



Develop an internal and external communications strategy for D&I



Examine and address any possible biases in talent management processes (hiring, promotion, and development)

# Our Diversity and Inclusion Goals

We are committed to attracting and retaining the best talent, ensuring our talent-attraction methods are unbiased, and our hiring managers are equipped to assess talent fairly.

Our processes related to recruiting, talent management, compensation, and benefits are designed to ensure that they support equality of employees at all levels throughout their career development. We also have a variety of programs and policies in place to facilitate a work-life balance and family focus.

These include participation in voluntary affirmative action programs, where we establish annual goals in each location and employment category; collection and filing of Equal Employment Opportunity (EEO) data in our US and Canada operations; and in the UK, annually reporting the mean and median difference in the average pay for males and females in our [Gender Pay Gap Report](#). We are proud that our gender pay gap of 0-3% over the past years is lower than the UK national average of around 15%.



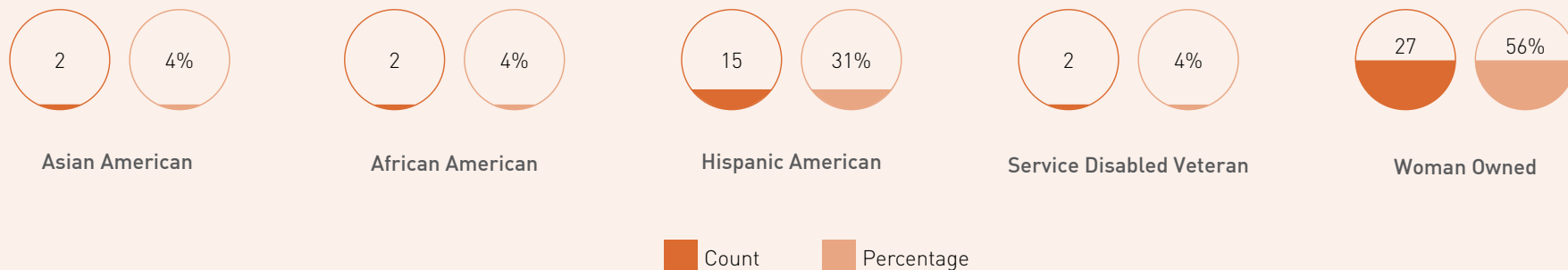
## Highlight Story: Supporting Minority-Owned Businesses

To understand how we can better support underrepresented groups through our business practices, our US team has been tracking our spending with minority-owned businesses since 2015.

- In FY19, we purchased from 86 certified minority-owned businesses.
- In FY20, that number dropped to 71 vendors due to COVID-19 shutdowns and many vendors refusing to renew their certification.
- In FY21, our number of certified minority-owned vendors dropped down to 48, however we significantly increased our spending with the 48 vendors to our highest in five years. Though only 48 are currently certified, we purchased from a total of 82 minority-owned businesses in FY21.
- From FY19 to FY21, we increased our spending with minority-owned businesses by 12%.

The table across shows the breakdown of the 48 certified minority-owned businesses we purchased from in FY21 by classification of minority.

### Purchase Figures from Certified Minority-Owned Businesses FY21





## Highlight Story: Our UK Diversity and Inclusion Successes

In the UK, we pursued several initiatives to support gender equality and multi-cultural awareness and to challenge bias.

### In support of gender equality:

**W**e established a European Women's Network following International Women's Day in FY20, to help female colleagues from Portugal, the UK and the US in different departments and levels connect, mentor and collaborate. Virtual meetings take place two to three times a year on the following topics: influencing others without authority, mastering your elevator pitch, leadership skills, and decision making and adaptability.

We introduced an agile working policy in FY21, allowing non-site-critical employees to choose their workdays, hours and location, as long as they spend a minimum of two days a week in the office. Currently, we have 30 fully home-based employees, 190 agile employees, and 120 site-critical employees who are granted flexibility. We also extended our maternity or shared parental leave policy in FY21 to provide five additional leave days to anyone returning from a period of maternity or parental leave to use as needed in the first year they return to work.

### To celebrate the vibrancy of our diverse community:

**W**e introduced multi-faith rooms where people can pray or take a moment of quiet reflection. We also share multi-faith holiday messages on our TV screens around site to celebrate diversity. In 2021, the Culture Committee created a video compiled of messages from colleagues across the business, celebrating Eid al-Fitr and recognizing how those of us who don't participate could support our colleagues that do (for example, not eating in the office and changing vacation days to enable others to take time off during Eid).

### To challenge bias:

**W**e rolled out online Unconscious Bias training to all our UK leadership team and line managers in FY20, with refresher training planned for FY22. Our UK D&I Committee and several members of our UK leadership team participated in an anti-racism workshop delivered by Show Racism the Red Card. The content provided an introduction to racism in the workplace, focusing on unconscious bias and micro-aggressions.

# Empowering Our People

**We seek to empower our people by creating growth and development opportunities.**

We have a strong focus on helping our employees grow. We offer various opportunities for our employees to develop skills, so we can build, retain and motivate a winning team. We coordinate employee development across all our functions and locations around the world to ensure that our values align throughout our corporate culture.

We make sure our employees have the resources they need to be successful by offering online and on-site learning tools and training, apprenticeship program (UK operations), early career rotational programs, and tuition reimbursement. About 60 colleagues participate annually in online managerial and leadership skills training and more than 30 participants have used our apprenticeship programs to build capacity in operational performance, business administration, procurement, finance, and engineering maintenance.

Approximately 6% of our UK workforce is currently involved in apprenticeship training, beating the UK government benchmark of 3%. From FY19 to FY21, nearly 50 colleagues have taken part in one of our two- to three-year programs and another 50 received assistance to attend an accredited learning institution.



# Supporting Our Communities

**Our success depends on the success of local people, communities and businesses: co-building a positive future for them is a priority.**

We are proud to support several charitable and non-profit organizations in our communities, extending our support to new partners each year. Most organizations we support have missions focused on community development, environmental stewardship, hunger relief, STEM-based education and cultural programming. We are proud that our employees share our value of making a positive difference in our communities.

As part of our environmental stewardship, we offer free e-waste recycling services to the communities near our US operations and have long supported and sponsored the environmental stewardship organizations such as Blue Water Baltimore in Baltimore, Maryland and Teaching Responsible Earth Education in New Orleans, Louisiana (since 2019). On Earth Day each year, our employees across the globe take part in community clean-up events and tree plantings.



# Supporting Our Communities



## When our communities face challenges, we lend a hand to support our neighbors.

In FY20, during COVID-19, we worked closely with non-profit organizations and other businesses to help meet the need for food and resources in our communities. In the UK, during the peak of COVID-19 in 2020, we doubled our funding to support the community, which is primarily composed of Black, Asian and minority ethnic groups who were disproportionately affected by the virus.

In the aftermath of Hurricane Ida in FY21, we supplied financial assistance to local relief organizations in New Orleans and donated a trailer load of water and 7,000 bags of rice. Throughout the year, we help to feed the hungry through donations to organizations such as Catholic Charities of Baltimore and the MADA Community Centre food bank in Canada.

## We take a special interest in promoting science, technology, engineering and math curriculum to new generations in K-12 schools near our US refineries.

We helped establish STEM labs and provided equipment and supplies to Eugenio Maria de Hostos MicroSociety School in Yonkers, New York in FY19 and donated funds to the Yale County 4-H in Canada to support children in the farming community become successful adults. We provide scholarship funding at the college level in our US operations and at various schooling levels at our Belize and Mexico operations.

In FY20, we funded three apprenticeships for employees of our community partner, 15billionebp, an organization seeking to “transform young futures” by preparing and supporting children and young people in their “journey from the classroom to the workplace”. The organization supports youth in East London, particularly those from Black and Minority Ethnic (BAME) and socio-economically underprivileged groups.

In FY21, we worked with the Royal Docks Development team in the UK to launch the Royal Docks Internship Programme supporting local residents to gain the skills and knowledge needed to help kick-start their careers. The program successfully recruited 15 interns, offering one a full-time role after just six months of their placement.

# Supporting Our Communities

We also support the cultural life of our communities by sponsoring neighborhood concert series and film festivals, and supporting local museums, science centers and cultural and historic institutions. These institutions include Hudson River Museum in Yonkers, Maryland Science Center, Baltimore Museum of Industry and Crockett Historical Society in California.

Our employees also volunteer to support local causes and organizations. In the UK, we offer all staff three days of paid leave for volunteering activities and match employees with volunteering opportunities in the community and with our local charity partners. We run a 'volunteer in the community' scheme, which puts £250 towards personal volunteering activities. Staff who fundraise for our charity partners can apply for 100% match funding up to £3,000, or 50% for any other charity whose aims broadly fit our community objectives.

Since FY19, two dozen employees at our Baltimore Refinery volunteer in an oyster gardening program with the Chesapeake Bay Foundation to help increase the population of these natural water filters.

Our Chalmette Refinery employees in Louisiana volunteer each year at Magnolia Community Services in New Orleans, serving adults with developmental disabilities. At our Cleveland, Ohio facility, employees took part in the backpack challenge to collect new backpacks and school supplies for children in the care of the local family services division.



## Highlight Story: Our Company Collaborates with Belize Women's Groups to Provide Face Masks

**D**uring the height of the COVID-19 pandemic, we distributed locally made face masks to field workers, truck drivers, farmers and harvesting groups in the communities surrounding our Tower Hill Mill in Orange Walk, Belize. We secured and provided the materials to women's groups linked to cane farmer associations to make more than 5,400 face masks for the community.

**“As a company, we are committed to our people and the communities where we operate,”** said Projects Assistant Susana Castillo. **“Donating these masks is an example of our effective response in taking every precaution to protect all stakeholders, employees and the work environment to prevent the spread of COVID-19 while also supporting the livelihoods of vulnerable groups, like our program partners during these difficult times.”**

Masks were also distributed to our employees, strengthening the personal hygiene and sanitation procedures we implemented at the mill and cane field levels.



## Highlight Story: Lyle's Local Fund Strengthens Our East London Community for Fifth Year

In 2021, we launched our fifth annual Lyle's Local Fund to support social enterprises, schools, charities, community groups and not-for-profit organizations in our Newham, London community. The £25,000 fund, which complements our existing charitable and community giving, is underwritten by Tate & Lyle Sugars and administered in coordination with Newham Council. The Fund offers grants of up to £2,500 to finance projects that support safe, prosperous and healthy local communities.

To date, the fund has awarded more than £125,000 to more than 50 projects.



## Highlight Story: Supporting Our Communities through COVID-19

**F**or generations, we have been a pillar of support in the communities where we live and work, especially during times of need. Amid the challenges and uncertainty brought by COVID-19, we felt more than ever that we must do our part to help our neighbors.

As a food company, we viewed it as our responsibility to provide local families facing the disruption to jobs and pay with staple foods by donating to food pantries; to ensure children, whose access to meals at school has been impacted by closures, had access to feeding programs; and to help seniors who depend on meal sites access the resources they needed during the public health crisis.

We stepped up to support non-profits in our communities and to partner with other businesses working to help meet the increased need for food and resources. In addition to donating our sugar to local food banks, we provided financial assistance to food pantries and feeding programs.

In Belize, we made a donation of BZ\$250,000 to the COVID-19 National Oversight Committee's COVID-19 Pandemic Response, which helps prevent, test for and



stop the spread of coronavirus in the country. In the UK we doubled our funding to support the community, which is primarily composed of Black, Asian and minority ethnic groups who were disproportionately affected by the virus.

We also donated sugar from our refineries to local distilleries, which used it to create ethanol, a vital ingredient used in the hand sanitizer produced and donated to local hospitals and first responders.



## Highlight Story: Helping Save the Lives of Malnourished Children in Africa through Donation

**W**e value our ability to collaborate with organizations to help make people's lives better. One particularly special partnership was with an amazing non-profit called Edesia Nutrition that makes fortified ready-to-use therapeutic foods (RUTF) that are saving the lives of severely malnourished children throughout developing countries.

As an important carbohydrate, sugar is a key ingredient in Edesia's life-saving formula. Our donation of 44,000 pounds of extra fine granulated sugar from our Yonkers Refinery allowed Edesia to send four large shipping containers full of RUTF to treat children in Malawi and Mozambique. The two countries are part of our raw sugar supply chain.

**"We were excited to partner with Edesia to make these shipments of their tremendous products possible to Mozambique and Malawi,"** said Rafael Vayá, Vice President of Corporate Social Responsibility. **"We are particularly pleased that our sugar is used in Edesia's products and that we were able to help children in need in countries that regularly provide us with raw sugar."**

Established in 2009 and now making 1.5 million packets each day at its Rhode Island factory, Edesia has been our customer since 2017. Their peanut-based products are shipped all over the world to children in need and are distributed by humanitarian aid workers.



Our donation of 20 totes of Domino<sup>®</sup> Sugar provided an important ingredient to make Plumpy'Nut<sup>®</sup> and Plumpy'Sup<sup>™</sup> that saved more than 7,000 children suffering from malnutrition in Africa. Plumpy'Nut<sup>®</sup> is a fortified peanut paste that quickly treats the most severe malnutrition cases, and Plumpy'Sup<sup>™</sup> is used to treat moderately malnourished children. A full course of treatment for a severely malnourished child includes three sachets of Plumpy'Nut<sup>®</sup> a day for six to seven weeks, while a Plumpy'Sup<sup>™</sup> paste is eaten once a day for 12 weeks as a supplement. Both products are shelf stable, require no preparation before consumption and provide 500 calories per sachet.



# GOVERNANCE, COMMUNICATION AND REPORTING

Our mission to become the world's most sustainable sugar company is championed and led by our Senior Executive Team.

# Corporate Governance and Stakeholder Engagement

Our approach to sustainability programming is science based and transparent. Our governance mechanisms enable us to continually monitor and regularly report our progress in line with established standards. Where possible, we seek third-party validation for our governance mechanisms. Communicating our position in our sustainability journey is a priority and is done periodically in our sustainability report to internal and external stakeholders. We also produce monthly and quarterly reports with KPI progress updates to inform our ESG teams and senior leadership on achievements and setbacks alike.

## Governance

ASR Group is a privately owned organization. The company is led by a President, advised by an Executive Management Committee and answerable to a Board of Directors. The Executive Management Committee is composed of all key departmental and regional business leaders in the company.

ESG programming falls under the responsibility of the Chief Sustainability Officer (CSO), who answers directly to the President and is a seated member of the Executive Management Committee. Matters related to the Corporate Social Responsibility (CSR) and Operational Sustainability departments are discussed at the Executive Management Committee meeting quarterly and with the Board of Directors when appropriate. The CSO's primary staff consists of vice presidents or leading directors who focus on CSR policy oversight and compliance; ESG program management, data acquisition, and reporting; and other sustainability-focused special projects. In addition, the CSO has dotted line relationships across multiple departments to ensure multidisciplinary collaboration.



Luis Fernandez



Matthew Hoffman



Pepe Fanjul Jr.



Robert Underbrink



Armando Tabernilla



Vincent Burskey



Alejandro Londono

# Business Ethics

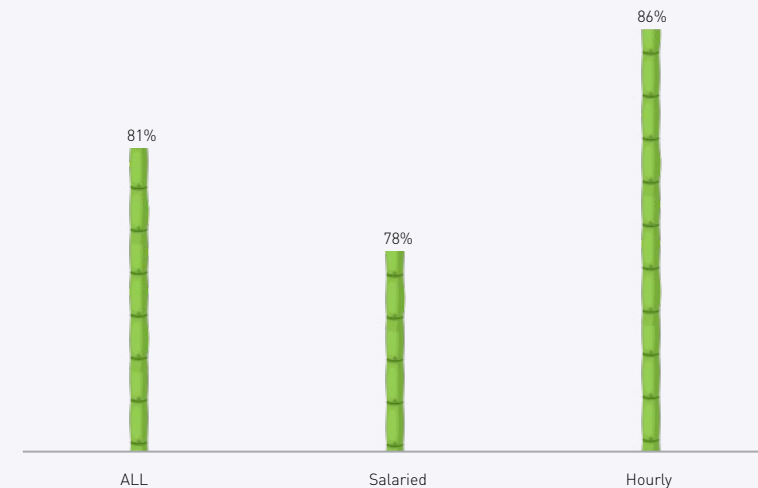
We have always been dedicated to conducting business in a lawful and ethical manner in all our operations. For this reason, we maintain a Code of Ethics and Business Conduct that can be viewed on our [website](#). The Code applies to employees, officers and directors of ASR Group, as well as our contract personnel, persons that we hire as our agents and our suppliers. Each employee agrees to carefully follow the Code and its principles in all of his or her business dealings, upholding our commitments to our key stakeholders, customers, suppliers, fellow employees and neighbors, as well as applicable government agencies, our lenders and our stockholders.

We publish a comprehensive approach to numerous topics, and training is provided to associates. Topics include:



All training is tracked for completion via the Company's Computer Based Learning Management System, and we aim for 90% engagement or better each year. For FY21, an overall percentage score of 81% was accomplished globally.

CY2020-21 Code of Ethics and Culture of Respect Training Completion



# Stakeholder Engagement

We interact with a wide range of stakeholder groups – from employees to customers and NGOs, to local and international community groups. We define stakeholders as those who affect and/or are affected by our business operations. Our stakeholders hold us accountable, help us understand and overcome barriers to progress, identify opportunities for improvement, and create and share CSR and sustainability best practices.

Our customers are among our most important stakeholders. Through regular meetings, we are transparent and communicate our activities, to uphold our shared values.

## Stakeholder Groups

## ASR Group Engagement

### Customers

Ongoing relationships, partnership projects, and other CSR related activities

### Social Certification Standard organizations

Interaction and participation in regular meetings, provide feedback and attendance to standards' annual conferences

### NGOs

Certification schemes, partnership remediation programs, and other consulting and training related activities

### International Financial Institutions (IFIs)

Partnerships in socio-economic development programs, including Climate Smart Agriculture

### Communities

Annual activities, including school funding, projects to prevent impact on the environment, food banks, and other community activities.

Remediation programs – prevention/eradication of child/forced labor, alternative livelihoods to working in the sugarcane industry and best agricultural management practices: soil management, dealing with pesticides, cane varieties, etc.

# IT Security, Anti-Corruption and Grievance Programs

## IT Security and Compliance Cyber Risk Assessment Program

As part of the Governance portion of ESG, we protect and secure our data and our customers' data through processes and technologies that prevent and eliminate cyberattacks. The Security Architecture team is responsible for all solutions in compliance with the company's security and governance requirements, working closely with the Chief Information Security Officer to determine the Information Technology Security strategy, rollout of new security technologies and internal investigations.

We did not experience any personal data incidents that resulted in a requirement to report to the global data protection authorities during FY19 to FY21. Neither were there any personal data protection incidents causing exposure to high risk or material harm.

## Anti-Corruption Due Diligence Program

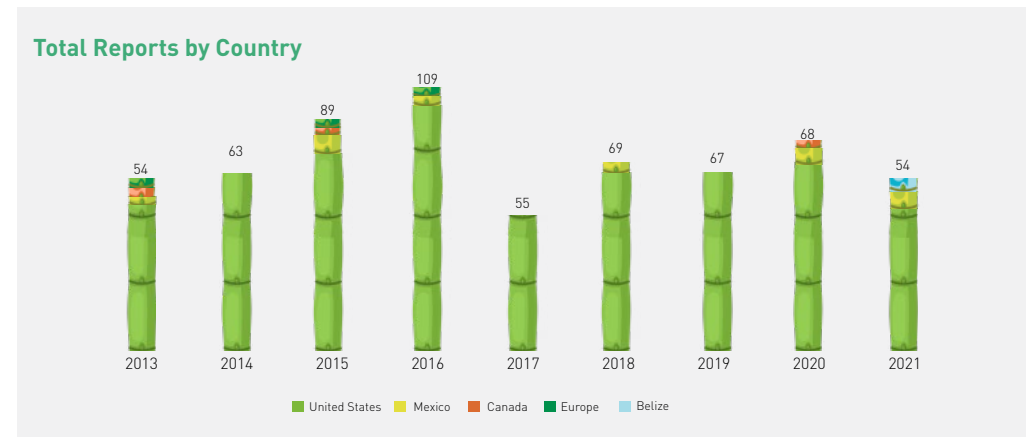
The company has established a process to review new and existing customers and vendors using World Check One Database. This checks for economic sanctions, AML, criminal activity, and other issues with third party customers and vendors. Any exceptions are reviewed by Legal as well as the Risk Department.

## Whistleblower and Grievance Program

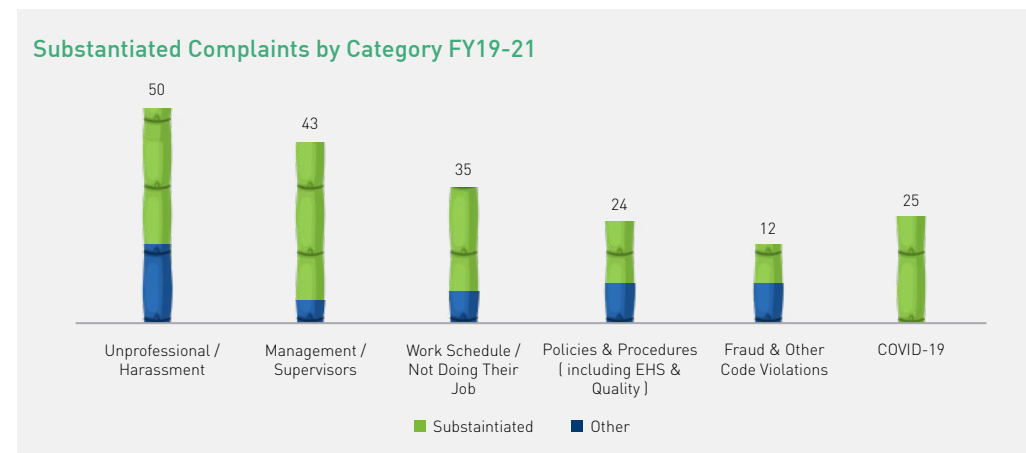
As a measure to confirm compliant systems are in place and operational, Corporate Compliance confirmed that 100% of all hotline systems were available and provided in the primary local languages of the region. These systems are tested for access and availability annually.

When considering all cases from FY13 to FY21, a total of 628 reports were received and addressed. These reports included 548 phone calls, 70 emails and 10 web reports through the hotline functions made available.

FY20 and FY21 saw the unique addition of COVID-19 concerns added to the reporting program. The breakdown of report by location is represented in this graph:



Substantiated complaints identified and addressed from FY19 to FY21 are depicted in this graph:





# CLOSING

Thank you for your interest  
in our ESG Program.

# Closing Thoughts

Thank you for your interest in our ESG Program. We are delighted to share our results and hope you feel, as we do, that our programs have continued to mature over the years since our last report. We have not only advanced our program objectives, but we have adapted as our stakeholders identified new focus areas. Many of these are not easy problems to solve. As such, we seek to partner with other like-minded companies in the effort. If you are a stakeholder and this report does not resolve a need in your programming, we invite you to contact us. We look forward to an open dialogue.

If there are further questions that we can answer, please feel free to communicate (preferably via your Sales or Customer Service Representatives) with the following primary points of contact:



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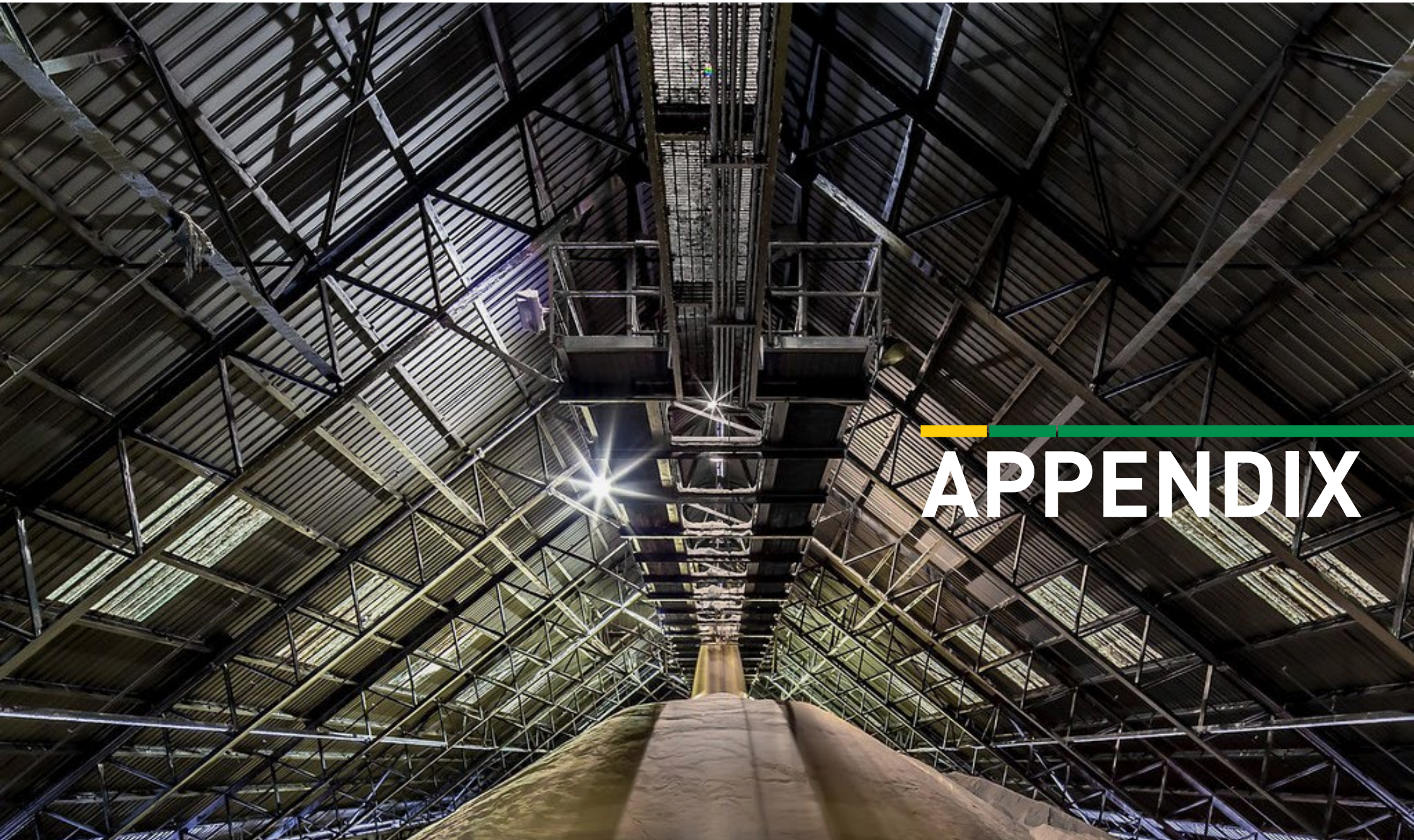
## **Julia Clark**

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# APPENDIX

# About this Report

ASR Group established a new global sustainability function in FY21. This is our first sustainability report since FY18. In the report, we set out our strategic priorities for sustainability. We have not sought external assurance from third parties with respect to the information presented in this report. This Sustainability Report provides a concise overview of our strategic priorities for sustainability as well as initial commitments and goals, which we will develop in future reports. We see this as an iterative process and will continue to ask for feedback from key stakeholders on how we can improve our reporting and disclosures each year.

## Scope and Time Horizon of this Report

This report details our efforts in key target areas relating to corporate social responsibility and operational sustainability from the start of FY19 to the close of FY21, which covered October 1, 2018 to September 30, 2021. FY12 serves as our baseline year.

## Scope and Scale of Operations Included:

### Sugar Refineries and Sugar Mills

Baltimore, Maryland – USA  
 Chalmette, Louisiana – USA  
 Crockett, California – USA  
 Yonkers, New York – USA  
 Lisbon, Portugal – EU  
 London, England – EU  
 Toronto, Ontario – Canada  
 Veracruz – Mexico  
 Orange Walk – Belize  
 Brindisi – Italy

### Non-Refinery Operations

Buffalo, New York – USA  
 Calumet, Illinois – USA  
 Chicago, Illinois – USA  
 Nashville, Tennessee – USA  
 Cleveland, Ohio – USA  
 Plaistow, England – EU  
 Belleville, Ontario – Canada  
 Fortin – Mexico

Data from administrative office locations in Florida, Veracruz, London and Mexico City was limited and is not included in the boundary of this report. Water, energy, waste and GHG emissions for these facilities are de minimus in the scope of our operations. Fuel use and electricity purchase in agriculture operations in Belize and Mexico were included with the mill reports. Non-mechanical agricultural GHG influences are still being assessed.

## Forward-Looking Statements

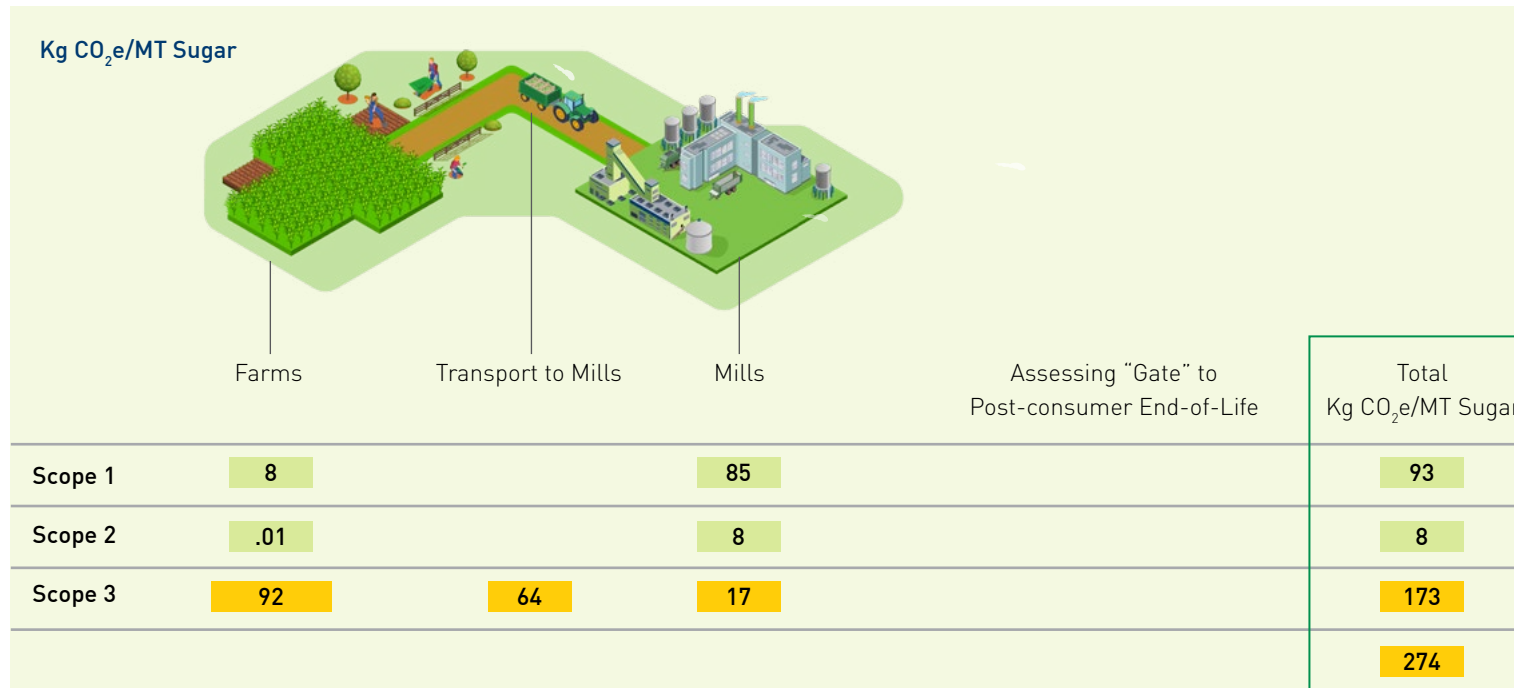
This report contains forward-looking statements regarding our plans and expectations with respect to sustainability. The forward-looking statements include the goals and commitments described in this report and the other statements that address our future, which include statements that are introduced with words such as expect, intend, anticipate, plan, and phrases of similar import. Actual results may differ materially from the results suggested by the forward-looking statements for a range of reasons, including the need to develop new technology, the cost of developing that technology and of delivering that technology, the acceptance of and demand for that technology by our distributors and farmers, competitive responses from other manufacturers of equipment, intellectual property claims by others, the need and challenges in attracting and retaining qualified employees, government regulation, and other factors. We disclaim any obligation to update any forward-looking statements, except as required by law.

# Value Chain pLCA: Regional

## Primary contributors to carbon emissions by operation:

- Farm and mill: Fertilizer production and decomposition, and fuel use in vehicles
  - Regional FAO data was used where supplier data was not inventoried.
  - Land use change influence is under review.
- Logistics: Freight movement by shipping vessels
- Refineries: Stationary fuel use for process steam generation, downstream wastewater treatment needs, energy required for ingredient supplies and solid waste treatment

## Farm to Mill Gate pLCA for Mexico & Belize Region FY21



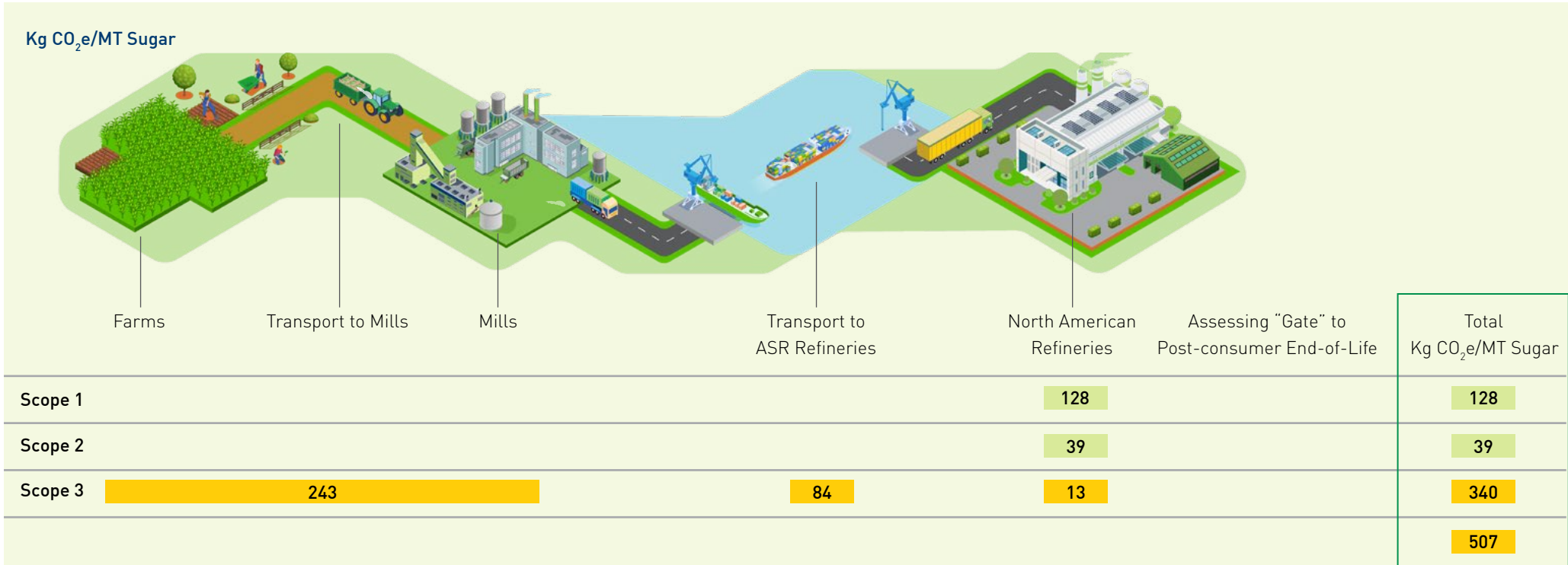
Based on inventoried data per GHG Protocol (Tier 1)

Based on Tier 1 calculations, supplier data, informed assumptions, and UN data models

(Not all categories of Scope 3 influence have been calculated; please refer to page 113 for a heat map outlining the current program maturity).

# Value Chain pLCA: Regional

## Farm to Refinery Gate pLCA North America Region FY21



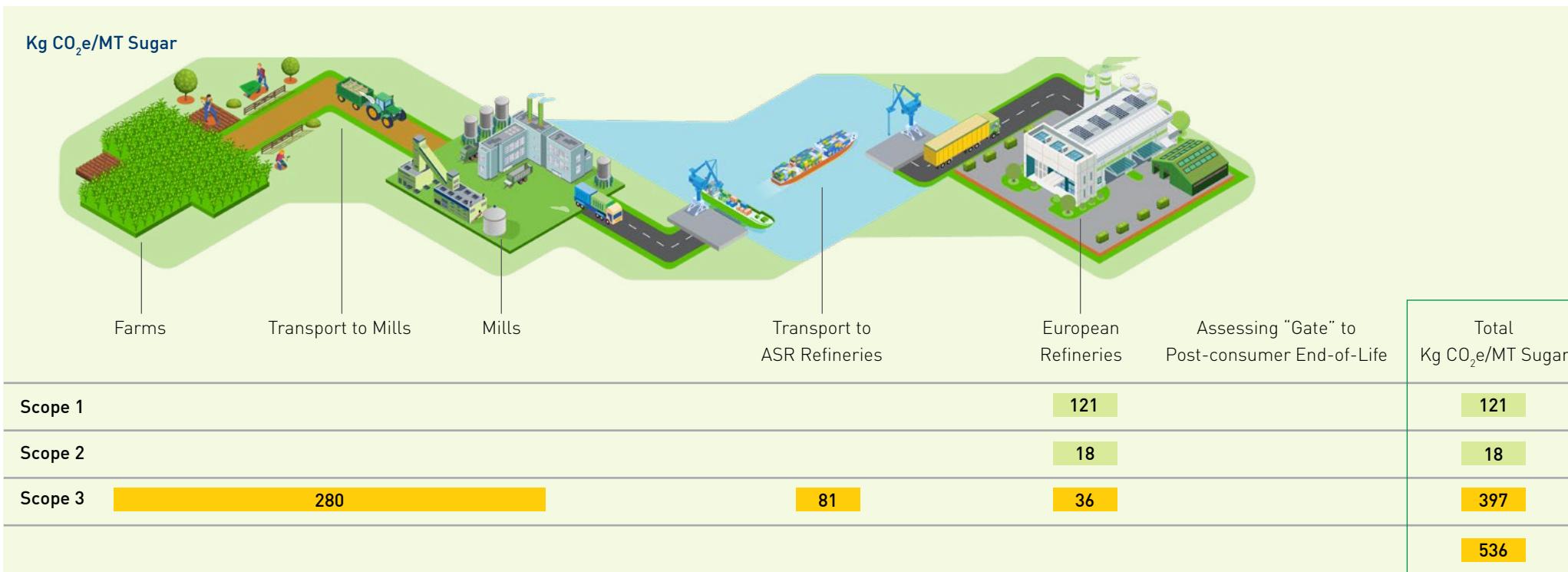
Based on inventoried data per GHG Protocol (Tier 1)

Based on Tier 1 calculations, supplier data, informed assumptions, and UN data models

(Not all categories of Scope 3 influence have been calculated; please refer to page 113 for a heat map outlining the current program maturity).

# Value Chain pLCA: Regional

## Farm to Refinery Gate pLCA European Region FY21



Based on inventoried data per GHG Protocol (Tier 1)

Based on Tier 1 calculations, supplier data, informed assumptions, and UN data models

(Not all categories of Scope 3 influence have been calculated; please refer to page 113 for a heat map outlining the current program maturity).

# Glossary of Abbreviations and Key Terms

## Glossary of Abbreviations

BTU:	British Thermal Unit
pCWT:	100 pounds of product
kW:	Kilowatt
kWh:	Kilowatt hour
MBTU:	1,000 BTUs
MMBTU:	1,000,000 BTUs
MT:	Metric Ton
mWh:	Megawatt hour
IPCC:	Intergovernmental Panel on Climate Change

## Key Terminology

Base year/Baseline	A historic datum (a specific year or an average over multiple years) against which a company's emissions are tracked over time.
Biofuel	Fuel made from plant material, e.g. wood, straw and ethanol from plant matter.
Carbon sequestration	The uptake of CO <sub>2</sub> and storage of carbon in biological sinks.
Direct GHG emissions	Emissions from sources that are owned or controlled by the reporting company.
Emissions	The release of GHG into the atmosphere.
Emission factor	A factor allowing GHG emissions to be estimated from a unit of available activity data (e.g. metric tons of fuel consumed, metric tons of product produced) and absolute GHG emissions.
Greenhouse gases (GHG)	For the purposes of this standard, GHGs are the six gases listed in the Kyoto Protocol: carbon dioxide (CO <sub>2</sub> ); methane (CH <sub>4</sub> ); nitrous oxide (N <sub>2</sub> O); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulphur hexafluoride (SF <sub>6</sub> )
GHG sink	Any physical unit or process that stores GHGs; usually refers to forests and underground/deep sea reservoirs of CO <sub>2</sub> .
GHG source	Any physical unit or process which releases GHG into the atmosphere.
Indirect GHG emissions	Emissions that are a consequence of the operations of the reporting company, but occur at sources owned or controlled by another company.
Life Cycle Analysis	Assessment of the sum of a product's effects (e.g. GHG emissions) at each step in its life cycle, including resource extraction, production, use and waste disposal.
Product life cycle emissions	All the emissions associated with the production and use of a specific product, from cradle to grave, including emissions from raw materials, manufacture, transport, storage, sale, use and disposal.
Renewable energy	Energy taken from sources that are inexhaustible, e.g. wind, water, solar, geothermal energy, and biofuels.
Scope:	In reference to its use within the Green House Gas Protocol, the operational boundaries in relation to indirect and direct GHG emissions.
Scope 1 inventory	A reporting organization's direct GHG emissions.
Scope 2 inventory	A reporting organization's emissions associated with the generation of electricity, heating/cooling, or steam purchased for own consumption.
Scope 3 inventory	A reporting organization's indirect emissions other than those covered in Scope 2 that occur in the value chain of the reporting company, including both upstream and downstream emissions.

# Product Life Cycle Data Reliability Heat Map



The graphic below represents our current state of confidence for the data we have collected on Scopes 1, 2, and 3 carbon emissions. We will continue to improve upon our product's life cycle analysis as our own data and the GHG Protocol evolve. We believe our datasets are well established within our business units and have engaged our suppliers to gain further insight into the raw materials or finished goods we use in our machinery. We have filled perceived voids in user specific emission factors with predictive models using the most accurate international databases or commonly accepted methodologies we could locate.

The Heat Map below denotes our current state of data acquisition.

Scope 1 & 2 data quality is strong and information is collected via monthly operational reports. Scope 3 data is under review and is being further matured.

■ Data available and 
 ■ Data estimated or 
 ■ Not currently 
 ■ Not Applicable

Value Chain Segment	Process	Scope	Refineries								Non-Refining Operations							Mexico/Belize			Corporate								
			TOR	YON	BAL	CHA	CRO	SID	THA	BRI	PLA	CHI	CLE	CAL	NAS	BUF	BEL	ISN	FOR	BSI	WPB	LON	MXC						
Land Use Change	<b>Land Use</b>	<b>1   3</b>																											
Farms	<b>Cane Production</b>	<b>1   2   3</b>																											
Mills	Transportation to Mills	1   3																											
	Milling Operations	1   2   3																											
	<b>Total Mills</b>	<b>1   2   3</b>																											
Transport to Location	Raw Sugar	1   3																											
	Ingredients	3																											
	Chemicals	3																											
	Maintenance Materials	3																											
	Packaging	3																											
	<b>Total Transport to Refineries</b>	<b>1   3</b>																											
Materials Production & Use	Raw Sugar	3																											
	Ingredients	3																											
	Chemicals	3																											
	Maintenance Materials	3																											
	Packaging	3																											
	<b>Total Materials</b>	<b>3</b>																											
Refineries & Mills	Energy Production & Use	1   2																											
	Water Usage	1   3																											
	Waste Treatment	1   3																											
	Self-generated Solid Waste	3																											
	Refrigerants	1   3																											
	Transportation to Warehouse	1   3																											
	3rd Party Warehousing	3																											
	Transportation to Consumer	1   3																											
	Packaging End of Life	3																											
	<b>Total Refineries</b>	<b>1   2   3</b>																											
NROs/Goods Out Supply Chain	Transportation to NROs/Co-Packers	1   3																											
	Production at NROs/Co-Packers	1   2   3																											
	Transportation to Warehouses	1   3																											
	3rd Party Warehousing	3																											
	Transportation to Customer	1   3																											
	<b>Total Goods Out Supply Chain</b>	<b>1   2   3</b>																											
Other	Business Travel	3																											
	Employee Commute	3																											
	Office Electricity Consumption	2																											
	Office Consumables Consumption	3																											
	<b>Total Other</b>	<b>2   3</b>																											

■ Data available and 
 ■ Data estimated or 
 ■ Not currently 
 ■ Not Applicable



# Global Reporting Initiative (GRI) Standards

In preparing this report, we have considered the requirements, reporting principles and structure set out in the Global Reporting Initiative (GRI) standards as these are viewed as leading practice in sustainability reporting. Over the next financial year, we will work towards aligning the reported information to the requirements set out in the latest GRI standards.

Topic	Content	Page number and/or URL and/or our direct report	Reference
General Disclosures			
Organizational Profile	Name of the organization	Cover page	GRI 102-1
	Activities, brands, products, and services	9, 11	GRI 102-2
	Location of headquarters	Florida	GRI 102-3
	Location of operations	11	GRI 102-4
	Ownership and legal form	9	GRI 102-5
	Markets served		
	Information on employees and other workers		Organization-specific
	Supply chain	11	Organization-specific
	Significant changes to the organization and its supply chain	10	Organization-specific
	Precautionary Principle or approach		GRI 102-11
	External initiatives	Reference to ASR's website	Organization-specific
	Membership of associations	Reference to ASR's website	GRI 102-13
Strategy	Statement from senior decision-maker	7	GRI 102-14
	Key impacts, risks, and opportunities		GRI 102-15
Ethics and Integrity	Mechanisms for advice and concerns about ethics	84	GRI 102-17

Topic	Content	Page number and/or URL and/or our direct report	Reference
Governance	Governance structure	14, 83	GRI 102-18
	Delegating authority	14	GRI 102-19
	Executive-level responsibility for economic, environmental, and social topics	14, 83	GRI 102-20
	Composition of the highest governance body and its committees	83	GRI 102-22
	Chair of the highest governance body	83	GRI 102-23
	Role of highest governance body in setting purpose, values, and strategy		GRI 102-26
	Evaluating the highest governance body's performance		GRI 102-28
	Identifying and managing economic, environmental, and social impacts	13	Organization-specific
	Effectiveness of risk management processes		Organization-specific
	Review of economic, environmental, and social topics		Organization-specific
	Highest governance body's role in sustainability reporting		GRI 102-32
	Communicating critical concerns		GRI 102-33
Stakeholder Engagement	List of stakeholder groups	85	GRI 102-39
	Identifying and selecting stakeholders	85	Organization-specific
	Approach to stakeholder engagement	85	Organization-specific
	Key topics and concerns raised		Organization-specific
	Defining report content and topic boundaries		Organization-specific
	List of material topics	13	Organization-specific
	Changes in reporting		GRI 102-49
	Reporting period		GRI 102-50
	Date of most recent report		GRI 102-51
	Reporting cycle		GRI 102-52
	Contact point for questions regarding the report	88	GRI 102-53

Topic	Content	Page number and/or URL and/or our direct report	Reference
<b>Economic Disclosures</b>			
Procurement Practices	Proportion of spending on minority suppliers	72	Organization-specific
Anti-corruption	Anti-Corruption Due Diligence Program	86	Organization-specific
<b>Environmental Disclosures</b>			
Materials	Packaging	40	Organization-specific
Energy and Emissions	Decarbonization approach	16	Organization-specific
	Product Life Cycle	17	Organization-specific
	Value Chain Product Life Cycle Analysis (pLCA)	18	Organization-specific
	Carbon Footprint - Our Operations	19, 27-29	"GRI 305-4 Organization-specific "
	Energy Conservation and Emission Reduction Initiatives	21-24	Organization-specific
	Renewable energy	25-26	Organization-specific
Water	Water consumption	33	Organization-specific
	Waste water discharge	33	Organization-specific
	Water conservation initiatives	34-35	Organization-specific
Waste	Waste reduction	36-37, 39	Organization-specific
	Waste reduction initiatives	38	Organization-specific
Environmental Compliance	Non-compliance with environmental laws and regulations	During the reporting period, no monetary fines or sanctions were levied upon us for any non-compliance with environmental laws and regulations	GRI 307-1
Supplier Environmental Assessment	Suppliers assessed using environmental criteria	50-51	Organization-specific
<b>Environmental Disclosures</b>			
Employment	New hires and Turnover		Organization-specific
	Employee benefits	68	GRI 401-2
	Parental Leaves	73	Organization-specific

Topic	Content	Page number and/or URL and/or our direct report	Reference
Occupational Health and Safety	Health and Wellness	68	Organization-specific
	Work-related injuries	69	Organization-specific
Training and Education	Employee development programs	74	Organization-specific
Diversity and Equal Opportunity	Ratio of basic salary and remuneration of women to men	71	GRI 405-2
Labor Practices	Child labour	53, 55, 59	Organization-specific
Rights of Indigenous People	Land rights	62	Organization-specific
Human Rights	Human rights	62	Organization-specific
Local Communities	Community engagement, impact assessments, and development programs	53-57, 75-81	Organization-specific
Supplier social assessment	Suppliers assessed using social criteria	51-52	Organization-specific
Public Policy	Political contributions	No political contributions were made during the reporting period	GRI 415-1
Marketing and Labelling	Packaging	40	Organization-specific
	Incidents of non-compliance concerning product and service information and labelling	There were no incidents of non-compliance reported during the reporting period	GRI 417-2
	Incidents of non-compliance concerning marketing communications	There were no incidents of non-compliance reported during the reporting period	GRI 417-3
Socioeconomic Compliance	Non-compliance with laws and regulations in the social and economic area	There were no incidents of non-compliance reported during the reporting period	GRI 419-1



# 2019-2021 SUSTAINABILITY REPORT

## ASR Group

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