

## Introduction

Florida Crystals Corporation and its subsidiaries (collectively, “*FCC*”) is committed to ensuring the protection and preservation of human rights in our operations, and we require the same commitment from our contractors, suppliers and other business associates (collectively, “*Stakeholders*”).

As a sugarcane company, FCC takes our social responsibilities seriously. Ensuring the sustainability of our operations, our supply chains and our products is one of FCC’s core values, and respecting human rights is fundamental to that goal. These principles drive us to continually strengthen our Corporate Social Responsibility (CSR) efforts so that we can have a positive impact on human rights.

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## Our Commitment

FCC recognizes that we have a responsibility to address any adverse human rights impact that may be present in our operations and to use our leverage to encourage our Stakeholders to respect human rights in our supply chains.

FCC respects and promotes all fundamental human rights outlined in the United Nations’ (UN) International Bill of Human Rights and the International Labor Organization’s (ILO) Core Conventions, as set forth in the Declaration of Fundamental Principles & Rights at Work. FCC is also committed to conducting ongoing human rights due diligence in line with the UN’s Guiding Principles on Business & Human Rights and to follow the Organization for Economic Cooperation & Development’s (OECD) Due Diligence Guidance for Responsible Business Conduct.

Production of cane sugar is at the heart of our operations in Florida. FCC recognizes that growing sugarcane domestically may bring occasional risks and responsibilities, because a risk may exist that third party vendors occasionally may not ensure compliance with international human rights principles. In evaluating our own operations in such instances, FCC relies on internationally recognized social responsibility and environmental sustainability standards such as Sedex – SMETA 4 Pillars to ensure compliance with fundamental human rights.

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## Oversight and Accountability

Human rights oversight is the responsibility of FCC’s Legal and Human Resources Departments. The Vice Presidents of each of these departments report to FCC’s Chief Executive Officer and Executive Vice Presidents. FCC’s Vice President & General Counsel oversees the Corporate Social Responsibility (CSR) function with support from the Vice President, CSR, of an affiliated company. An annual briefing on matters related to human rights is presented to FCC’s key executives and additional discussions are held as needed.

FCC's Executive Vice Presidents, with the aid of their senior leadership team, execute strategic planning and decision-making in line with FCC's established mission and values and in keeping with the vision established by FCC.

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## Assessment

FCC's due-diligence process actively ensures compliance with human rights standards in our own operations. FCC's CSR, Sustainability and Risk Management functions regularly perform a risk analysis and evaluation of our own operations, business practices and outcomes that includes feedback from internal and external stakeholders.

Regarding our own operations, FCC has established a three-step process to verify our suppliers:

- Step 1** FCC follows and adheres to its Code of Ethics and Business Conduct and Supplier Code of Conduct, the latter is based on internationally recognized standards.
- Step 2** FCC undergoes an annual independent sustainability audit based on the Sedex SMETA 4 Pillars protocol, which reviews compliance concerning social and ethical practices including compliance with labor, health, safety, environmental and business integrity standards.
- Step 3** Once a sustainability audit is completed, our operation focuses on addressing and resolving areas of non-compliance and continuous improvement.

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## Findings and Remediation Programs

FCC's CSR efforts provide us with tools not only to assess our own operations, but also to identify what is a potentially significant concern, evaluate its potential effect, and obtain ongoing feedback from key Stakeholders. This approach allows FCC to focus our remediation efforts on priority areas. FCC works with various stakeholders to find solutions to issues by using in-house and third-party expertise. FCC also collaborates with and supports NGOs focused on improving the quality of life of residents in the communities where it operates. The common objective of all these parties is to achieve a sustainable operation that ensures compliance with fundamental human rights.

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## Reporting Mechanism

FCC maintains communications channels for internal and external stakeholders. Employees can submit grievances via FCC's Ethics Hotlines and external stakeholders may file objections via a web-based email mechanism to ensure access to a transparent, protected and confidential investigative tool for the complaints of the parties concerned. FCC's Ethics Hotlines are toll-free telephone numbers managed by a third-party to

provide employees a method of communicating concerns and to protect their identity to the greatest extent possible.

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## **Future Reporting**

FCC will provide an annual update on our efforts to preserve and promote respect for human rights in our own operations.