Madrid, 18/05/2023

SUGAR GLOBAL TRADING HUMAN RIGHTS POLICY

Respect for human rights is a fundamental value of SGT.
SGT is committed to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in its relationships with workers, suppliers and business partners.

This Policy is guided by international human rights principles encompassed contained in the treaties of international and European Law, namely:

1. The International Bill of Human Rights of the United Nations (UN).

o The Universal Declaration of Human Rights.
o The International Covenant on Civil and Political Rights.
o The International Covenant on Economic, Social and Cultural Rights.

2. The fundamental conventions of the International Labor Organization (ILO) numbers 29, 87, 98, 100, 105, 111, 138 and 182, as well as the ILO Declaration on fundamental principles and rights at work.

3. The United Nations Convention on the Rights of the Child.

4. The European Convention on Human Rights.

The following business standards and voluntary initiatives have also been taken into account:

- The principles of the United Nations Global Compact.
- The OECD Guidelines of the Organization for Economic Cooperation and Development for Multinational Companies.
- The ILO's Tripartite Declaration of Principles on Multinational Enterprises and Social Policy.
- The United Nations Guiding Principles on Business and Human Rights.

This policy applies to SGT and any group companies. SGT also expects suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

SGT commits t**o use due diligence as a means to identify and prevent human rights risks to people in its operations and value chain**. When adverse human rights impacts are identified, SGT commits to provide for or cooperate in, their fair and equitable remediation.
The Human Rights Policy is overseen by SGT's Board of Directors, including the Chief Executive Officer.

Diversity and Inclusion

SGT values the diversity and inclusion at work and is committed to equal opportunity and are intolerant of discrimination and harassment.
SGT works to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.

Freedom of Association and Collective Bargaining

SGT respects workers' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment and commits to establishing a constructive dialogue with the employers representatives and to bargaining in good faith with such representatives.

Safe and Healthy Workplace

The safety and health of workers is of paramount importance. SGT has established policies and systems to secure health and safety in operations.

Forced Labor and Human Trafficking

SGT prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, or other modern forms of slavery and any form of human trafficking.
No employee may be coerced to work or subjected to physical punishment or threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control. All workers must be provided with a written employment document (e.g., offer letter, contract, etc.) that clearly states the terms of their employment (e.g., hours, pay, benefits, etc.) in a language understood by the worker, with a verbal explanation provided when necessary. All employment agreements must be freely agreed to in writing by the worker and their employer.

All workers have freedom of movement, and the conditions of employment must not restrict their movement through the retention of identity papers, holding of deposits, accommodation requirements, or any other action aimed at restricting worker mobility. Furthermore, in line with the Employer Pays Principle, no worker should be required to pay recruitment or other similar fees to secure or retain their employment. The cost of recruitment should be borne by the employer.

Child Labor

SGT prohibits the use of child labor in its operations and supply chain, the hiring of individuals under the age of fifteen (15) or the local legal minimum working age or the compulsory schooling age, whichever is higher. Workers under 18 are never permitted to perform work that may threaten their health and safety or hinder their education or vocational training. We require the age of the workers to be verified at the time of hiring.

Work Hours, Wages and Benefits

All SGT workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

Land Rights

Sugar is supplied to SGT by its suppliers, both directly and indirectly, from farms, plantations and processors globally. SGT recognizes the significant implications regarding the respect for human rights that land use across its value chain may have. SGT has a zero- tolerance policy for land displacements of any legitimate land tenure holders.

Public Reporting

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our Human Rights Report and annual Sustainability Report. This reporting cross references the UN Guiding Principles Reporting Framework.