GRIEVANCE MECHANISM – EXTERNAL STAKEHOLDERS

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

Introduction

ASR Group is dedicated to conducting business in a lawful and ethical manner in all of its operations. For this reason, we adopted the ASR Group Code of Ethics and Business Conduct. This code applies to all ASR Group personnel, including employees, officers, and directors, as well as our contract personnel and persons that we hire as our agents. We also adopted the ASR Group Supplier Code of Conduct that applies to our suppliers. These codes can be found at our website https://www.asr-group.com under the tab ³DOCUMENT DOWNLOADS´

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

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

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

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

Our Approach

ASR Group aims to promote and respect all fundamental human rights outlined in the 8 Q L W H G 1 D W L R Q V ¶ , Q W H U Q D W L R Q D O / D E R U 2 U J D Q L] D W L R Q ¶V Core Conventions, as set out in the Declaration of Fundamental Principles & Rights at Work.

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