	Habib Sugar Mills Limited	Document #	PLY-SM-0416
		Effective	18-04-2022
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1. Purpose

Habib Sugar Mills Limited is committed to establishing and maintaining a structured and comprehensive Sustainability Management Policy to ensure responsible, sustainable, and transparent practices across all our operations, including Mills, Distillery, and Agricultural Farms.

This commitment is in compliance with local laws, the United Nations Guiding Principles on Business and Human Rights (UNGP), and Bonsucro Standards (v5.2, Chain of Custody, Smallholder, and EU-RED).

Through this commitment, we aim to foster accountability, trust, and positive impacts on our stakeholders such as employees, suppliers, customers, service providers, local communities and the environment, ensuring the highest standards of sustainability and ethical conduct in all aspects of our operations

- **Promote long-term sustainability:** Align operational practices with global sustainability standards to safeguard environmental resources for future generations.
- **Ensure ethical conduct:** Uphold human rights, labor rights, and community engagement while preventing corruption and fostering transparency in all business activities.
- **Drive continuous improvement:** Facilitate ongoing improvements in operational efficiency, environmental conservation, and social responsibility across the supply chain.
- **Mitigate risks:** Identify and manage risks associated with non-compliance to international standards in human rights, environmental protection, and business ethics.
- **Support climate resilience:** Adapt to climate change impacts while reducing greenhouse gas emissions and promoting eco-friendly practices.
- **Enhance stakeholder trust:** Build trust and strengthen relationships with all stakeholders, including employees, communities, and customers, through transparent and responsible operations.


2. Scope

This policy relates to how our raw material and products (Sugarcane, White Refined Sugar, Ethanol, and Liquefied CO2 Gas) activities and operations within our company and across our entire supply chain (including farms) will be continually reviewed and improved, so that we can integrate environmental and social considerations into our everyday practices and make a positive contribution to society and environment.

3. Policy Objectives:

The main objectives of the Sustainability Management are:

- 3.1.1 Human rights aligned with (UNGP).
- 3.1.2 Indigenous peoples' rights, community engagement & land rights.
- 3.1.3 Labor rights.
- 3.1.4 Occupational health and safety.
- 3.1.5 Environmental protection/ non conversion of HCVs.
- 3.1.6 Anti-Corruption/Anti-Bribery/money laundering & Ethical conduct.
- 3.1.7 **Key Areas Covered:**
- 3.1.8 **Human Rights Aligned with UNGP:**

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- Commitment to respecting and promoting human rights in line with UNGP.
- Avoidance of direct or indirect involvement in human rights abuses.
- Policies ensure non-discrimination, equal opportunities, and freedom from forced labor.
- Promotion of dignity and respect for all individuals within operations.
- Regular human rights due diligence to assess and address risks.

3.1.9 Indigenous Peoples' Rights, Community Engagement & Land Rights:

- Respect for the rights of indigenous peoples, including cultural heritage and land.
- Engagement with indigenous communities based on free, prior, and informed consent (FPIC).
- Minimizing negative impacts on indigenous communities.
- Transparent and meaningful communication with local communities.
- Promotion of collaboration and trust with affected communities.

3.1.10 Labor Rights:

- Compliance with international labor standards, including fair wages and safe working conditions.
- Strict prohibition of child labor, forced labor, and worker exploitation.
- Commitment to a non-discriminatory and harassment-free workplace.
- Provision of training and professional development opportunities.
- Regular assessments to ensure labor law compliance.

3.1.11 Occupational Health and Safety:


- Prioritization of employee safety and well-being.
- Implementation of comprehensive health and safety protocols to prevent accidents.
- Regular safety training and provision of necessary safety equipment.
- Compliance with all occupational health and safety laws and standards.
- Continuous monitoring and improvement of safety measures.

3.1.12 Environmental Protection/Non-Conversion of HCVs:

- Commitment to environmental protection, particularly the preservation of HCV areas.
- Avoidance of converting or degrading sensitive ecosystems.
- Implementation of sustainable practices across the supply chain.
- Regular environmental impact assessments to mitigate potential harm.
- Promotion of biodiversity conservation and ecosystem restoration.

3.1.13 Anti-Corruption/Anti-Bribery/Money Laundering & Ethical Conduct:

- Zero-tolerance policy for corruption, bribery, and money laundering.
- Ethical conduct embedded in all business activities.
- Internal controls to detect and prevent illicit activities.
- Compliance with international anti-corruption regulations and promotion of transparency.
- Reporting mechanisms for whistleblowers with protection from retaliation.

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5. Sustainability Management Plan:

5.1.1 Stakeholder Mapping and Engagement Plan:

The operator shall develop a comprehensive Stakeholder Mapping and Engagement Plan to ensure transparent engagement with all relevant parties, including employees, local communities, and external partners.

5.1.2 Risk Assessment: A thorough risk assessment shall be conducted to measure compliance with the Bonsucro Production Standard, addressing key areas such as human rights, labor rights, and environmental impact.

5.1.3 Improvement and Opportunity Assessments:

The operator shall identify and assess opportunities for improving sustainability across the supply chain. This process includes evaluating practices within both certified and non-certified areas.

5.1.4 Continuous Improvement Plan:

A Continuous Improvement Plan shall be implemented for areas outside the units of certification. This ensures sustainability efforts are applied throughout the organization and supply chain.

5.1.5 Health & Safety Management Plan:

An Occupational Health and Safety Management Plan will be developed to protect the health and well-being of all workers. Regular audits and reviews will ensure adherence to safety regulations.

5.1.6 Climate Mitigation and Resilience Plan:

The operator will adopt a Climate Mitigation and Resilience Plan aimed at reducing greenhouse gas emissions and enhancing the organization's capacity to adapt to climate change.

5.1.7 Biodiversity Management Plan: The Biodiversity Management Plan will focus on preserving ecosystems and protecting species affected by agricultural activities. This includes maintaining and restoring natural habitats within the operator's sphere of influence.

5.1.8 Soil Management Plan: The Soil Management Plan will ensure the sustainable use and protection of soil resources. It will be reviewed every three years to maintain its relevance and effectiveness.

5.1.9 Water Stewardship Plan:

The Water Stewardship Plan will promote the responsible use and conservation of water resources. This plan will also be reviewed every three years.

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5.1.0 Integrated Pest Management (IPM) Plan: An Integrated Pest Management Plan will be developed to minimize the use of chemical pesticides, focusing on natural and sustainable pest control methods.

6. Responsibilities:

6.1.1 Compliance Measurement and Criticality

- The Sustainability Management Committee will regularly measure compliance with all aspects of the SMP, assessing the level of criticality for non-compliance. Corrective actions will be promptly taken where necessary.
- Concerned department/ sectional in-charges are responsible to implement the sustainability policy in their respective departments.

7. Review and Compliance




7.1.1 Annual Review Process

The Sustainability Management Policy will be reviewed & updated annually or when needed by Sustainability Management Committee.

PREPARED BY
MANAGER HSE

REVIEWED BY
DIRECTOR OPERATION (MR & BSTL)

APPROVED BY
RESIDENT DIRECTOR

REVIEW STATUS					
REVIEW DATE	REMARKS	REVIEW BY	SIGNATURE	APPROVED BY	SIGNATURE
18-04-2023	NO CHANGE	HSE MANAGER		DIRECTOR OPERATION (MR & BSTL)	
16-04-2024	CHANGED (DUE TO STANDARD REVISION ON BPS (V-5.2))	HSE MANAGER		DIRECTOR OPERATION (MR & BSTL)	