

1. Does the information shared on the Code self-assessment form involve any additional steps in the annual recertification audit process?

The annual recertification audit of the Bonsucro Production Standard and compliance with the Code of Conduct are two independent but related processes, since to certify it is a mandatory requirement to be a member and to be up to date with the membership fee.

If a current member does not submit the Code of Conduct self-assessment form in March 2021 and has a recertification audit, then the risk is that such certification will not be approved as their membership is not up to date with the new requirements.

2. Should members prepare to attend to what is expected in the Code of Conduct?

Yes, for all current Bonsucro members the Self-Assessment of the Code of Conduct must be done by March 31, 2021 (Bonsucro will share more guidance around September 2020)

3. Is the Code Continuous Improvement Report independent of the recertification process?

Yes, in practice the Continuous Improvement Report will be a set (7-8) simple questions about members' commitments and progress in relation to their sugarcane and Bonsucro business.

However, it must be borne in mind that Principle 5 of the Production Standard is all about continuous improvement in key areas of the business, therefore, attention must be paid to the inputs that may be obtained from implementing this Principle and that contribute to the report against the Code of Conduct.

4. What is CEDR and what roles will it play in Bonsucro's new Grievance Mechanism?

The Center for Effective Dispute Resolution (CEDR) is an alternative dispute resolution and mediation body based in London. It was founded as a non-profit organization in 1990, with the support of the Confederation of British Industry (CBI) and a number of British companies and law firms, to encourage the development and use of the Alternative Dispute Resolution (ADR) and mediation in commercial disputes.
More information at: <https://www.cedr.com/>

CEDR will be managing complaints and grievances raised against Bonsucro members and will provide recommendations to Bonsucro.

5. If after March 31, 2021 a current member company has not done the self-assessment process, would a non-conformity be raised in the event of an audit?

The Bonsucro audit and compliance with the Code of Conduct are two independent but related processes, since in order to be audited it is a mandatory requirement to be a member and to be up to date with the membership fee. Therefore, if a current member does not submit the Code of Conduct Self-Assessment information by March 2021 and has a planned audit, then the risk is that such certification will not be approved as their membership is not up to date with the new requirements.

In practice, more than a non-conformity with the Bonsucro Production Standard, it would be a non-conformity of requirements with the Bonsucro Certification Protocol V5.1, which requires membership. In the following link you can review the Protocol specifically Point 4 Client Application, subsection 4.1 and 4.2 (<http://www.bonsucro.com/wp-content/uploads/2017/04/PTC-Bonsucro-Certification-Protocol-v5.1.pdf>)

6. Is the issue of reporting legal issues during membership application verified by auditors?

The review process of the information sent when applying to membership is an exclusive work of Bonsucro staff (as well as the research) and depending on the level of risk (low, medium or high) the Board of Directors will participate. Bonsucro accredited auditors do not have a role in this process, because Bonsucro's due diligence process is not an audit.

7. The format of the continuous improvement report is through the web or can each mill do it in its own way?

The format is still in development, but it will surely be standardised so that everyone can answer the same questions and thus be able to obtain aggregated input from all members. The form will be available on the website.

8. So clearly you cannot ask for information on this point in the audit about possible legal conflicts.

Keep in mind that Principle 1 of the Bonsucro Production Standard is "Compliance with the Law", therefore if there are serious legal issues open at the time of an audit, the auditor will obviously verify the status and may have a negative impact on Nonconformities.

9. The fact that a company / mill presents in its history findings of child labor, is this a broad limitation for not continuing with the application for membership?

The new Code of Conduct and its requirements is a photograph of the current state of the company / mill at the time of applying for membership, if there were cases of child labor and that has already been eradicated, then it should not affect the present. Precisely these new membership processes are focused on reducing and eradicating risks. Companies are required to report any material risks or issues that occurred up to six years before their application date.

10. Are the Bonsucro Training Providers within the scope of the Code of Conduct?

Certifications Bodies and Licensed Trainers are not members of Bonsucro by definition and therefore the Code of Conduct does not apply, they are monitored by other internal protocols and license agreements.

11. What were the main changes in the new Code compared to the previous one?

The previous Bonsucro Code of Conduct was completely reviewed and the new one has embraced a set of commitments to be made by Bonsucro members. These commitments are related to:

- Conduct their operations in compliance with all applicable laws and regulations.
- Supporting Bonsucro's vision of sustainable producer communities and resilient, assured supply chains by the continuous improvement of the environmental and social impacts of your sugarcane production, processing and sourcing activities
- Respect human rights and support the protection of forests and other natural ecosystems
- Comply with Bonsucro's Competition and Anti-Trust Compliance Policy
- Comply with applicable data privacy laws
- Work with a remediation or grievance mechanism, aligned with the UNGP Effectiveness Criteria, to address involvement in adverse environmental and social impacts
- Not make misleading or unsubstantiated claims about Bonsucro and comply with Bonsucro's Claims & Labelling Rules
- Agree to be bound by the terms of Bonsucro's Grievance Mechanism
- Report annually to Bonsucro on Continuous Improvement and how they are achieving commitments
- Pay membership fees

12. Does the Code define how my organization can use Bonsucro logos and make related claims?

No. The Code of Conduct won't present information about Bonsucro claim and labelling rules. This type of information can be consulted in our Claims & Labelling Rules manual, available in our website. [hyperlink]

13. What are the practical actions I have to take in order to comply with the commitments established by the Code?

Bonsucro has published the Code's implementation guideline, that has many examples of what each one of the Code's commitments means in practice for different types of organizations and for various aspects of the business. The content from the implementation guideline will provide you orientation on what can be applicable to your organization, bearing in mind that those are only examples and not mandatory requirements, that you can fully adopt or make adaptations to your business reality. The national law will be always the top reference for any organization to implement the Code's commitments.

14. Do I need to report all the legal processes when filling the Legal Compliance verification of the Code of Conduct's self-assessment form? How can I know which types of legal processes to report?

Every organization is responsible to internally judge the relevant legal issues to be reported to Bonsucro when filling the self-assessment form. The legal departments are used to perform such critical analysis and can support this reporting process. Bonsucro provides a list of 6 themes that connect to our scope of work, and the organization needs to assess whether it has or had over the last 6 years any related legal compliance issue. By relevant we mean systemic risks or issues that can put in check the organization's reputation and consequently Bonsucro's.

