



CHAIN OF CUSTODY POLICY

1. Purpose:

The purpose of this policy is to ensure the integrity, traceability and proper documentation of Bonsucro certified products handled by JDW Sugar Mills Limited (Unit-1). This policy ensures compliance with Bonsucro Chain of Custody Standard Version 5.1 and supports transparency, trust and sustainable sourcing practices in the sugarcane value chain.

2. Scope:

This policy applies to all departments and personnel involved in the procurement, processing, handling, storage, dispatch and sales of Bonsucro certified sugar and molasses. It includes both physical and administrative control points in the supply chain.

3. Commitment:

JDW Sugar Mills Limited (Unit-1) is committed to:

- i. Implementing a robust Chain of Custody system.
- ii. Maintaining clear documentation and traceability records.
- iii. Complying with all Bonsucro Chain of Custody Version 5.1 requirements.
- iv. Providing training to staff on ChoC procedures and responsibilities.
- v. Conducting regular internal audits and continuous improvement

4. Chain of Custody System:

The factory follows the Mass Balance Chain of Custody model as per Bonsucro guidance.

5. Roles and Responsibilities:

- **Procurement Department:** Maintains records of Bonsucro certified sugarcane received from certified farms.
- **Production Department:** Maintains records of quantities of certified sugar, molasses and verifies production data and ensures separation or reconciliation as per the Mass Balance system.
- **Sales and Dispatch Department:** Maintains sales records of certified sugar and molasses, issues transaction certificates and ensures that Bonsucro claims are only made for certified volumes.

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6. Traceability and Record Keeping:

- Each batch of Bonsucro certified cane received is recorded with source, quantity and delivery date.
- Certified product flow is tracked through a documented Mass Balance system.
- All ChoC related documents (receipts, production logs, inventory records and sales documents) are retained for at least 5 years.
- Records are made available during Bonsucro audits and internal reviews.

7. Identification and Segregation:

- As physical segregation of certified and non-certified cane is not possible in our production process, certified volumes are recorded and reconciled regularly to ensure that outgoing certified product volumes do not exceed incoming certified cane volumes.
- Certified products are clearly labeled in dispatch documentation.

8. Training and Awareness:

All relevant staff are trained on the Bonsucro Chain of Custody requirements including Mass Balance principles, documentation and verification protocols. Refresher training is conducted annually or when updates to the standard occur.

9. Non-Conformance and Corrective Action:

Any non-conformance with the ChoC policy is investigated, documented and corrective actions are implemented. Repeat non-conformities may result in disciplinary action or process redesign.

10. Review and Updates:

This policy is reviewed annually by the Compliance Officer and updated as required to reflect changes in the Bonsucro standard or internal operational changes.

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