

# Bonsucro – Membership Application Procedure

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## 1. Membership application phases

- a. **Candidate Member:** a company that applied for membership and is EITHER currently going through the 30-day public consultation period on the Bonsucro website and the due diligence appraisal on the application form submitted by the applicant, AND/OR has not paid its annual membership subscription.
- b. **Under review:** A candidate member for whom comments have been raised during the public consultation period and/or issues have been identified through Bonsucro’s due diligence appraisal, and/or is now expecting a decision from Bonsucro. This phase can generally last up to 90 days and the applicant will be kept informed on any further extension needed;
- c. **Full Bonsucro Member:** a candidate member that has been accepted into membership after the public consultation period and has paid its annual membership subscription.

## 2. Applicants’ responsibilities

### 2.1 The applicant organisation:

- (a) Is responsible for identifying its suitable membership class, within those valid in the Bonsucro system, and for contacting Bonsucro previously to application in case of doubt
- (b) Must provide truthful information in the application form
- (c) Must read and agree to the [Bonsucro Code of Conduct](#)
- (d) Agrees that there will be a 30-day public consultation period, where any interested stakeholder may submit comments on the applicant’s records and behaviour in relation to the Bonsucro Code of Conduct, and that negative comments may lead to a formal review by the Membership Committee and/or Bonsucro Board of Directors, before its membership application is processed;
- (e) Agrees that, within the 30-day candidacy period, Bonsucro will also carry out an appraisal of the information submitted through the application form (due diligence<sup>1</sup>) and Bonsucro retains the right to carry out all the necessary checks and request any additional information to the

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<sup>1</sup> Bonsucro will review the information submitted through the application form and check it against a risk-assessment framework developed in line with the Code of Conduct.

candidate member in order to complete the assessment and inform the decision on membership.

### **3. Application processing**

- 3.1 Membership applications can only be made online, on the Bonsucro website, through the [membership application form](#);
- 3.2 Upon receiving an online membership application, Bonsucro will confirm receipt of the application and notify the candidate member of the start of the public consultation period (30 days), when the status of the application shall be “Candidate Member” and the applicant will be listed as such on Bonsucro website [membership page](#);
- 3.3 If negative comments are received during the public consultation period on the applicant’s records and behaviour in relation to the Bonsucro Code of Conduct, Bonsucro will inform the candidate member and follow the Comments Process (see 4) and the candidate’s membership application will be discussed and decided by Bonsucro. The status of the application would be “Under Review”.
- 3.4 If Bonsucro, whilst carrying out an appraisal of the information submitted through the application form and the necessary due diligence checks, identifies areas of risk in relation to the membership of the candidate member, this may lead to a formal internal review (the application would be ‘Under Review’) which in turn may lead, to Bonsucro discretion, to either (i) approve the membership application, (ii) approve under the conditionality of an action plan to be put in place to address the risk areas, or (iii) to reject the membership application.
- 3.5 If Bonsucro rejects the membership application, the candidate member shall be notified by Bonsucro as soon as possible and shall be refunded the full amount of its annual membership subscription (if previously paid to Bonsucro).
- 3.6 Candidate members within the Farmer membership class, sub-class “less than 100Ha of sugarcane area” (small growers), for whom there is no annual membership fee, will not be issued with an invoice, and shall become members upon successfully completing the consultation period.
- 3.7 Following the candidacy period, if no issues are identified, Bonsucro will invoice the candidate member for its annual membership subscription.
- 3.8 Upon payment of the annual membership subscription invoice the new member will receive a “Welcome Pack” and will be featured as ‘Member’ on Bonsucro website [membership page](#).

## 4. Comments Process

4.1 Bonsucro has a 30-days public consultation period for each new membership application, when it invites any interested party to comment on an applicant's records and behaviour in the past six (6) years relation to the Bonsucro Code of Conduct. The public consultation period provides an opportunity to interested parties to provide evidence of an alleged breach of Bonsucro Code of Conduct, alerting Bonsucro to any alleged risks linked to an applicant organisation.

4.2 Bonsucro will strive to handle comments in an equitable and timely manner, and will aim to adhere to the following principles:

- Gather the relevant facts from all parties
- Operate in a spirit of openness while maintaining confidentiality of business sensitive information
- Maintain a formal record of comments
- Follow up on comments received
- Use the comments received to inform the candidate member's due diligence process and risk assessment.

4.3 Comments must be submitted in writing by clicking on the candidate member's name displayed on the Bonsucro [membership page](#), within the 30 days of public consultation. The comment must be in English, which is the working language of Bonsucro. All supporting evidence submitted in English will be taken into consideration. Bonsucro reserves the right to dismiss supporting evidence submitted in any other languages.

4.4 The Commenter is required to provide all of the following information before a comment shall be considered:

- (a) Information on Commenter, including representative organisation, contact person, title/position, contact information.
- (b) Name of individual or organisation the comment refers to.
- (c) Details on nature of the comments and which of the Bonsucro articles is being or has been broken.
- (d) Documentation and other supporting evidence to directly substantiate the comment.
- (e) Suggestions on what in the Commenter's view could be specific actions and activities that could address the issues raised in the comments (bearing in mind that this does not guarantee these will be implemented)

4.5 Upon receipt of the comments Bonsucro will make an initial assessment of the comment and determine whether the comment is valid. Matters that will not be considered include:

- Allegations against non-applicants
- Allegations unrelated to Bonsucro business, specifically outside an applicant's sugar cane business
- Comments sent outside the available timeframe for submitting comments.

4.6 If the comment is out of the scope, it will be dismissed and the Commenter will be notified as soon as possible.

4.7 If the comment is within scope, but lacks required information or substantial evidence, the Commenter will be asked to provide the required additional information. The available evidence will be considered final and Bonsucro will proceed using the comments received for the due diligence process.

4.8 Evidence shared with Bonsucro will be shared with the candidate member to give them an opportunity to respond (generally within 10 business days). The Commenter may request that the information is shared anonymously should there be human rights concerns/to protect the identity of individuals at risk.

4.9 The candidate member is responsible to bear any associated costs related to the comments and due diligence process.

4.10 Results of Bonsucro's due diligence on candidate members are not made publicly available but will be communicated to the candidate member and the Commenter.

4.11 Bonsucro will assess the comments received on a candidate member as part of the due diligence process that Bonsucro carries out on all organisations applying to become Bonsucro members.

4.12 Recommendations and decisions regarding a membership application comment are not subject to appeals. The Commenter may choose to initiate a grievance under the terms of the Bonsucro Grievance Mechanism if the membership application is approved. Matters assessed as membership application comment must be reassessed following the Grievance Mechanism requirements if a formal grievance is filed.