



SASOL

Supplier Code of Conduct

2022



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1. Purpose and scope

The way in which we conduct business is informed by our five shared values and behaviours. Our values are translated into principles which in turn, are described in our Code of Conduct. Our suppliers are expected to follow the Supplier Code of Conduct which is supported by Sasol's Code of Conduct. Suppliers are also expected to operate in accordance with values and behaviours comparable to ours and in a manner, which is consistent with prudent business practice.

This Supplier Code of Conduct sets out Sasol's principles and expectations on how our suppliers of goods and services, including their representatives and employees, are to conduct business with and deal with us.

This Supplier Code of Conduct is applicable to all current and prospective suppliers. Our suppliers are expected to assist Sasol in enforcing this Code of Conduct by communicating its principles to their employees and other relevant parties.



1.1. Ethical Interaction | Being Accountable

Our shared value of being Accountable, commits us to always do what is right and to maintain the highest level of ethical conduct in our interactions with each other. This Code of Conduct provides clarity on our commitment to honesty, integrity, compliance, excellence, quality, being liable, reliable and ethical behaviour between Sasol and its current and prospective suppliers and vice versa.

Sasol rejects fronting and all forms of dishonesty and has a policy of zero tolerance of illegal or dishonest conduct, irrespective of whether the consequences are big or small:

- We guard against bribery, corruption, fraud and terrorism

- We have zero tolerance for bribery and corruption and dishonesty in any form.
- We will not offer, ask for nor accept, any bribes, directly or indirectly. This applies to our employees, partners, suppliers, customers, regulators and shareholders.
- No one connected to Sasol should be influenced or try to influence another person, company or government agency unlawfully. We are honest and transparent with our customers, suppliers, partners, regulators and shareholders. We select our business partners and suppliers carefully and would rather lose business or miss an opportunity, than obtain or retain it dishonestly or illegally.
- We will not use our social investment activities, sponsorships or donations to obtain any inappropriate benefit.
- We guard against the perception of dishonesty and corruption.

Sasol reserves the right to decide which business entities to forge a transactional business relationship with and stakeholders, companies or institutions that have demonstrated business integrity and who subscribe to similar values and business ethics as Sasol, are our preferred business partners.

Sasol’s suppliers play a critically important role in Sasol’s ability to operate and provide products and services to its customers. Sasol can only achieve its strategic business objectives through the support of trusted suppliers. This requires the highest professional and personal ethics in our relationships with each other.

Sasol strives to develop relationships with current and prospective suppliers that share similar values and that conduct business in a manner consistent with Sasol’s Code of Conduct and Sasol shared values.

Our Code of Conduct (our Code) is how we entrench and live Sasol’s values which are action orientated to easily translate into our daily interactions and behaviours. These values represent non-negotiable behaviours and the foundation of our organisation. Our Values provide the roadmap to the key behaviours set out in this Code, which are summarised below:

OUR VALUES	OUR BEHAVIOUR	CODE PRINCIPLES
<p>BE SAFE:</p> <p>We place the safety of our people first (Be it physical and/or psychological wellbeing)</p>	<ul style="list-style-type: none"> • Safety comes first in all I do, always • I care about my own safety and that of every person I work with. • I take a stand, speak up and own issues related to safety. • I stop what I am doing if it is unsafe and will not perform work that I am not qualified to perform. • I take time to understand the risk and potential severity of undesirable outcomes. 	<ul style="list-style-type: none"> • Zero harm remains our top priority, safety always comes first. • We ensure a secure and safe workplace, which advances the overall wellbeing of all. • We strive to reduce risks and minimize the potential impact of any incidents. • We learn from previous incidents • We create a safe environment where people speak up.

<p>BE CARING:</p> <p>We care deeply for our people, planet, and communities</p>	<ul style="list-style-type: none"> • I demonstrate care for every colleague in everything I do and/or say. • I approach any task as an opportunity to collaborate, learn and support the people I work with. • I celebrate my colleagues' successes and support their potential to develop further. • I will not engage in or tolerate any form of harassment or discrimination. • I will do my part to minimise environmental impacts and support the environmental sustainability initiatives • I consider others as equals and treat them the way I would like to be treated. • I am responsive, solutions driven and see myself as a force for good when I engage with all stakeholders. • I speak out against behaviours which infringe on human rights and report human rights violations to my line manager, supervisor, or the Ethics Line. 	<ul style="list-style-type: none"> • We prohibit and do not tolerate alcohol, drug and controlled substances abuse in the workplace. • We manage occupational health and the wellbeing of our employees through our employee wellness initiatives. • We do not tolerate harassment, victimisation, retaliation, intimidation, assault and bullying. • We invest in our people and care for each other, our customers, and fence line communities. • We apply labour and employment practices that are in line with local legal requirements, and the core conventions of the International Labour Organization. • We respect, uphold and protect human rights. • We positively engage our communities. • We work to create a positive and measurable socio-economic impact, responding to key societal challenges in the regions where we operate and with our fence line communities. • We minimise environmental impact and ensure sustainability in all we do. • We prohibit all forms of forced labour and child labour. • We uphold freedom of association and the right to collective bargaining • We apply local environmental compliance regulations
<p>BE INCLUSIVE:</p> <p>We foster inclusivity in all we do, our employees, our customers, and stakeholders.</p>	<ul style="list-style-type: none"> • I am aware of my own biases and challenge them constantly. • I know that my success is strengthened by the people I work with. 	<ul style="list-style-type: none"> • We promote and embrace diversity and inclusion. • We drive gender equality and employment equity fairly • We treat each other with dignity and respect.

	<ul style="list-style-type: none"> • I make a point of seeking out and listening to my colleagues', customers, or stakeholders' views, no matter who they are or where they come from. • I respect and promote diversity, and am aware of my own biases and challenge them constantly. 	<ul style="list-style-type: none"> • We do not tolerate and accordingly uproot racism and all other forms of unfair discrimination. • We apply rules fairly and consistently e.g. no selective discipline and/or unjustified preferential treatment
<p>BE ACCOUNTABLE:</p> <p>We own our results,</p>	<ul style="list-style-type: none"> • My decision making is reflective of Sasol's values • I embrace having a positive attitude and I strive for excellence in meeting my own as well as the performance targets of my team and colleagues. • I have the courage to own and acknowledge my mistakes in order to learn from them. • I have the courage to do the right thing. I speak up. • I am alert and responsive to all legal and compliance matters related to my work and take appropriate action when I see any non-compliance. • I see it, I own it. 	<ul style="list-style-type: none"> • We remove unnecessary bureaucracy and empower employees and teams to perform through effective governance • We ensure compliance with the requirements of applicable laws and adopted non-binding rules, codes and standard. • We assess the ethical standards of all our business partners and counterparties. • We protect Sasol's assets and intellectual property. • We ensure that all our data and information is accurate. • We cooperate fully with lawful investigations and legitimate requests for information in line with regulatory requirements governing access to information and the relevant Sasol policies. • We promote cybersecurity. • We keep accurate records and retain, protect and dispose of business records in accordance with regulatory requirements and Sasol's Document Retention Policy. • We do not engage or support any terrorist activities or organizations, nor actions that will endanger our country, and we do not engage in bribery or corruption. • We actively manage conflicts of interest and offer and accept only reasonable gifts,

		<p>entertainment and hospitality.</p> <ul style="list-style-type: none"> • We consider the appropriateness of our social investment activities as well as the appropriateness of providing donations and sponsorships. • We assess the suitability of accepting external directorships and cross or interlocking directorships and cross shareholding. • We manage our social media accounts responsibly, with sound judgment. • We commit to processing personal information lawfully and protecting the privacy of all our stakeholders
<p>BE RESILIENT:</p> <p>We boldly adapt to change and embrace agility.</p>	<ul style="list-style-type: none"> • I can be trusted to deliver the right quality product and services on time. • I go beyond what is expected to ensure customers and other stakeholders are satisfied. • I adjust to organizational and regulatory changes as needed to ensure compliance. • I keep an open mind to adapt with the changes that are happening around me. 	<ul style="list-style-type: none"> • We maintain productive stakeholder relationships. • We ensure quality customer service and products. • We deal fairly with customers and suppliers. • We work openly with governments and refrain from funding political parties. • We disclose information accurately and in a timely fashion. • We ensure awareness of the changing global regulatory landscape maintaining compliance with new laws and regulations. • We remain resilient in a lower carbon future, delivering value for today but not at the expense of the future. • We strive on technological innovation • We embrace change and work together as Team Sasol to deliver on our promises

2. Supplier Code of Conduct Principles

2.1. Respecting, protecting and Enhancing Human Rights

To recognise that all human beings have the right to be respected and treated with dignity, regardless of their race, gender, sexual orientation, language, religion, political or other opinion, national or social origin, as explained in the Universal Declaration of Human Rights, it is critical for the sustainability of our business.

Suppliers must undertake to respect, uphold and protect human rights and conduct business based on fair, lawful, efficient and transparent practices by exhibiting the behaviours in this section of the code.

The Supplier shall manage human rights impacts in their supply chain within their sphere of influence and responsibility. Suppliers, joint venture and business partners are expected to uphold our Human Rights Policy and encourage them to implement similar policies within their own businesses.

2.2 Indentured, forced, or child labour

All human beings have the right to exercise their freedom of choice and the right to work freely in accordance with the current labour legislation.

Suppliers must not participate in, or benefit from, any form of forced or indentured labour, (work performed involuntarily under threat of penalty). Forced labour includes bonded labour, debt bondage, forced prison labour, slavery, servitude or human trafficking.

Suppliers must work to eradicate child labour and must not allow the employment or use of such labour at any of their business centres, when it does not comply with agreements and recommendations of the International Labour Organisation (ILO) regarding the worst forms of child labour.

The use of legitimate workplace apprenticeships programs, which comply with all laws and regulations, are permitted. Children aged 15 to 18 may not be employed to perform work that is hazardous or harmful to their health, safety or morals, nor should they perform work that interferes with their education.

Our approach is premised on compliance with applicable legal requirements in all the jurisdictions in which business is conducted, including on child labour and the abolishment of modern slavery and human trafficking

2.3 Preventing Harassment, Retaliation and Bullying

Suppliers shall treat every employee with respect and dignity and shall not subject any employee to victimisation, retaliation, intimidation, humiliation, mobbing, false accusation, physical, sexual or racially abusive comments, gestures, materials whether in print, electronic or any other form, psychological or verbal harassment or abuse and any form of bullying. The supplier should have mechanisms to hear, process, and settle the grievances of workers.

2.4 Respecting Diversity | Avoiding Discrimination

Suppliers are expected to judge their employees based on their ability to do their work and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no unlawful discrimination based on political opinion, trade union membership, age, language, nationality, ethnicity, culture, race, gender, religion, disability, marital status, sexual orientation, health status and disabilities and so forth.

Suppliers should not tolerate and accordingly uproot racism and all other forms of unfair discrimination and apply rules fairly and consistently e.g. no selective discipline and/or unjustified preferential treatment

Offering fair and competitive wages/benefits drives employment equity and economic empowerment. The Supplier's compensation, benefit plans, skills development and training and employment-related decisions must be based on relevant and objective criteria. The supplier should promote equal opportunity, employment equity and economic empowerment and provide a living wage which enables workers to meet their basic needs and that of their dependents. Workers should be granted paid holiday and sick leave each year as well as parental leave for the care of a new-born or newly adopted child.

Working hours, overtime, breaks and rest periods, as set by local law, should be complied with. Where local law or industry standards fall below the provisions of the ILO which limits a work week to 48 - hours and no more than 12 hours overtime per week, the supplier should comply with the ILO standard.

2.5 Respecting Freedom Of Association And the Rights To Collective Bargaining

Our suppliers must maintain their employees' right to trade union and collective bargaining, respecting their freedom to join trade unions and the right to bargain collectively. The Supplier must comply with the local laws and regulations governing the legal rights of their workers to join or not join worker organizations including trade unions, and the right to bargain collectively.

Where local law prohibits the right to unionise and bargain collectively, or where only state-controlled organizations are allowed, the supplier should ensure that other forms of worker meetings and representation are allowed.

In addition, the supplier must take measures to ensure open channels of communication and negotiation between management and employees concerning all work-related issues.

Suppliers should uphold fundamental human rights and fair labour practices and have policies and practices in place on human rights.

2.6 Offering A Safe and Healthy Working Environment And Conditions That Do Not Infringe On Human Rights

The supplier is expected to place the necessary emphasis on safety, health and environment. It must provide safe and healthy working conditions for workers.

This includes the following:

- Providing safe, suitable and sanitary work facilities and supplying its workers with the protective equipment and training necessary to perform their tasks safely.

- Prevent alcohol, drug and other controlled substances abuse. The supplier should ensure that all its employees do not conduct business with Sasol whilst under the influence of alcohol, drugs and other controlled substances. Suppliers that do business with Sasol should not distribute, manufacture, possess or use drugs or alcohol in an unlawful or unauthorised manner in any way connected to Sasol. Suppliers should have measures to detect and prevent alcohol, drugs and other substance abuse. Sasol is allowed to test any person who wants access to our workplaces for intoxication. If they refuse to be tested, or if we discover they are intoxicated, we will deny them entry.
- Suppliers pro-actively manage and respond to supply chain safety, health and environmental and human rights risks, and actively minimise our impact on the environment and the communities where we operate
- Suppliers should strive to reduce risks and minimize the potential impact of any incidents.
- Suppliers should create a safe environment where people speak up and learn from previous incidents

2.7 Protecting the Environment and Respecting the Rights Of Communities

Sasol's purpose of "innovating for a better world compels us to deliver on the triple bottom line outcomes of People, Planet and Profit, responsibly and always with the intent to be a force of good.

Through our actions, we uphold Sasol's reputation and ensure our long-term success as a resilient, environmentally sustainable business that creates sustainable value for all our stakeholders and in a manner that supports the approach of achieving a balance between People, Planet and Profit.

The supplier is expected to conduct its operations in a manner that minimizes its impact on natural resources and protects the environment.

The Supplier shall comply with all applicable environmental laws, regulations and standards. All required environmental permits and registrations are to be kept current.

All hazardous materials and chemicals, including wastewater and solid waste, must be disposed of using environmentally responsible practices.

The Supplier shall respect the rights of communities and all indigenous people that may be affected or impacted by our business activities, including land tenure and water rights

Suppliers should be acutely aware of their impact on our environment and should always be on the lookout for opportunities to improve our facilities/infrastructure to reduce our footprint.

Sasol's five values, prioritised Sustainable Development Goals (SDGs) and approach to sustainability and supported by various company policies, underpin the Sasol Code of Conduct.

2.8 Avoiding conflicts of Interest including giving and receiving of gifts, entertainment and hospitality

A conflict of interest arises when a person's interests or activities influence, or appear to influence, the ability to act in the best interests of Sasol. Entering an arrangement that conflicts with the supplier's responsibility to Sasol must be avoided.

With respect to suppliers, a conflict of interest may arise if a supplier has a personal relationship such as a family relationship, a business/commercial/financial relationship, a romantic/sexual relationship with Sasol employee who can influence the award of a business tender to the supplier, or if the supplier works for another Sasol supplier, customer or competitor.

Suppliers must disclose actual or potential conflicts of interest and discuss them with Sasol's management. Any transaction that is approved, despite the actual or potential conflict, must be documented and communicated to Sasol.

2.9 Gifts, entertainment and hospitality

The supplier is prohibited from giving Sasol employees any gifts, entertainment and hospitality where there is a possibility of creating a conflict of interest. Gifts, entertainment or hospitality must be customary and proper under the circumstances and no obligation must be created.

The suppliers must have a process in place for managing the risk associated with the giving and receiving of gifts, entertainment and hospitality. As a minimum, the suppliers should avoid the following situations with respect to gifts, entertainment and hospitality:

- Avoid expectations of reciprocity
- Never offer or receive gifts, entertainment, travel benefits or hospitality from people (including their partners, family members or close friends) engaged in a tender, competitive bidding, pending legal proceedings, commercial negotiation or selling process
- Never accept or give prohibited gifts such as cash or a cash equivalent (shares, vouchers, prepaid debit cards or gift cards), or gifts, entertainment and hospitality that are of an indecent nature or given for inappropriate venues
- Never give or receive gifts, entertainment or hospitality if it could influence, or be perceived to influence, a person's objectivity in doing their job
- Avoid the offering of gifts, entertainment, travel benefits or hospitality to public officials unless it is lawful, reasonable and directly related to business activities
- Any gift or entertainment that would constitute a contravention of any law
- Accepting and offering gifts, entertainment and hospitality only in instances where Sasol has a direct relationship with the company concerned and where the host is present.
- Never give or receive exceeding the specified threshold, unless pre-approval has been obtained in accordance with the gifts, entertainment and hospitality policy
- Suppliers should prohibit the offering, or receipt, of any Gifts, Entertainment or Hospitality if they can affect or be perceived to affect the outcome of business transactions.

In addition, the supplier should have a process in place to declare all gifts, entertainment and hospitality offered or received that could be perceived to create a conflict of interest or are of significant value (US\$ 100).

2.9.1 Inappropriate and impermissible Gifts, Entertainment and Hospitality.

It is important to note that the appropriateness of any gifts, entertainment or hospitality must first be considered prior to assessing the value thereof. Even small or low value items could be inappropriate in certain circumstances.

Sasol prohibits the offering, or receipt, of any gifts, entertainment or hospitality if they can affect or be perceived to affect the outcome of business transactions.

No employee may receive or offer more than three gifts, entertainment or hospitality items / events from or to the same entity within one financial year, unless the fourth or any subsequent

item or event has been approved in accordance with the process set out in the Process and Guideline document. Low value gestures received from or provided to suppliers or customers such as the purchase of a cup of coffee or snack as part of site visits etc. will not form part of the tally of the number of gifts, entertainment and hospitality for the purpose of this clause.

No family members or close friends may be given gifts, entertainment or hospitality in the guise that they are suppliers or customers, and no family members or other third parties may accept any gifts, entertainment or hospitality to evade this Policy.

Gifts, entertainment or hospitality should only be accepted or offered if the intention thereof is to build and strengthen the business relationship with Sasol.

Sasol Employees may not solicit or induce any third party to provide him or her with any Gifts, Entertainment or Hospitality.

2.10 Providing accurate and complete information on quality and safety of products and services

The supplier must protect against defects in all stages of product development, including design, manufacturing, and marketing, to protect against product defects which could harm the life, health or safety of the consumer or others likely to be affected by the defective product.

Suppliers involved in any aspect of developing, handling, packaging or storing our products are expected to:

- Know and comply with the product quality standards, policies, specifications, and procedures that apply.
- Follow and adhere to good practices and testing protocols.
- Comply with all applicable laws and regulations including intellectual property laws.
- Report issues that could negatively affect the quality or perception of products.
- Deliver what is promised to customers and to keep commitments to customers

2.11 Accurate Record-Keeping

The supplier must keep accurate records of its business activities and products and is expected to:

- Cooperate with any legal requests for information
- Provide truthful and complete information with respect to product claims or attributes, financial information and non-financial information
- Promote cybersecurity and not be involved in cybercrimes
- Keep accurate records and retain, protect and dispose of business records in accordance with regulatory requirements.

2.12 Legal Compliance

The supplier must ensure the ongoing compliance with all applicable regulatory and legislative requirements. Key among these are the following:

Anti-bribery and corruption and money laundering

The supplier shall put measures in place to guard against bribery, corruption, fraud, money

laundering and terrorism.

The supplier shall comply with international and local anti-bribery and corruption laws and regulations. This includes offering, giving, promising, requesting, agreeing to receive or accepting a benefit from anyone with the intention of receiving an unfair advantage, even if it is via a third-party.

In particular the supplier will, during the existence of the contractual relationship with Sasol, not offer, or authorise payment, gift, promise or other advantage, whether directly or indirectly through any other person or entity, to, or for the use or benefit of any Sasol officer or employee or any public official (i.e. any person holding a legislative, administrative or judicial office) or any political party or political party official, where such payment, gift, promise or advantage would violate the applicable anti-bribery standards.

Facilitation payments, bribes, kickbacks, and similar payments are strictly prohibited. This applies even when local laws may permit such activity.

Suppliers must, as far as it is linked to its relationship with Sasol, keep proper accounting records of all payments (including any gifts, meals, entertainment, hospitality or anything else of value) made or received on behalf of Sasol.

Money laundering is prohibited. This includes trying to hide where unlawful money comes from and where it goes and anyone who has an interest in hiding this information and any money that finances terrorism.

Fair Competition and Antitrust

Sasol is firmly committed to free and competitive enterprise. Suppliers, agents or other individuals representing Sasol are expected to comply with all applicable antitrust and competition laws and regulations. Suppliers who are also competitors of Sasol shall not solicit any of Sasol's competitively sensitive information.

2.13 Trade sanctions

The supplier shall comply with all (and not contravene any) export control and sanction laws and regulations issued by the United Nations Security Council, the United States of America, the United Kingdom and the European Union regarding the export, distribution, sale, transfer and / or re-export and end use of certain goods and services to certain countries and / or certain person or entities as referred to in the aforesaid sanction laws and regulations.

The Sasol Sanctions Compliance Policy is a key sanctions and trade control resource available to suppliers.

2.14 Protecting confidential and personal information and intellectual property

Suppliers must protect all Sasol information, electronic data, and intellectual property or technologies with appropriate safeguards.

Suppliers may receive Sasol confidential information only as authorised by a confidentiality or non-disclosure agreement and must comply with their obligation not to disclose the confidential information, not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure:

- Suppliers may not use the Sasol trademark, images, or other materials to which Sasol owns the copyright, unless explicitly authorised
- Suppliers must protect personal information and ensure confidentiality and privacy rights of workers are respected by the supplier when it gathers private information or implements monitoring practices
- Suppliers should commit to processing personal information lawfully and protecting the privacy of all our stakeholders
- Suppliers should store personal information securely for a defined period and in accordance with applicable legislation
- Suppliers should give access only to the people who legitimately require personal information and respect internal information access governance policies and procedures
- Suppliers should treat personal information with the highest levels of confidentiality
- We process all personal information in line with applicable data privacy legal and compliance requirements.

To treat personal information in accordance with the Sasol Privacy Principles suppliers should familiarise themselves with the **Sasol Global Data Privacy Policy** also available on the Sasol Website

Suppliers should adopt appropriate security measures to protect the confidentiality, integrity and availability of all personal information.

Suppliers should minimise the amount of personal information we process, to what is strictly necessary to achieve our purpose.

Suppliers should respect privacy by storing personal information securely and handling it in accordance with the Sasol Privacy Principles.

3 Audits and Inspection

Verification of compliance is subject to audits by Sasol or a third-party designated by or otherwise acceptable to Sasol. Failure of supplier to comply, or failure to work with Sasol or a third party engaged by Sasol, to correct non-complying situation(s) is a ground for cancellation of orders, discontinued services or termination of the business relationship.

4 Report violations

Suppliers must promptly report any concerns and actual or potential violations of this Code to the Sasol Group Ethics Office through the Ethics Line.

Suppliers must provide reasonable assistance to any investigation by Sasol of a violation of this Code and they must protect anyone who works for them, either as an employee or a supplier, from any form of retaliation for reporting actual or potential violations.

Suppliers can contact the Sasol Ethics Line by calling any of the following numbers:

Canada	1855 421 8968
China	400 120 3284
Germany	0800 183 0965
Italy	800 974 741
Mozambique	800 112 233 (toll-free when using TDM network) / 800 333 312 toll-free when

	using Vodacom network)
Singapore	1800 216 3302
South Africa:	0800 016 017 (toll-free)
USA	1800 489 1727
United Kingdom	0800 032 4498

Suppliers can also submit a report in writing using the following details:

- Email: sasol@ethics-line.com
- Website: www.sasolethics.com

5 Penalties for non-compliance

Sasol reserves the right to terminate its business relationship with any supplier who violates this Code or if any of supplier's employees, agents or subcontractors violate this Code. Sasol also reserves the right to terminate its business relationship with suppliers who fail to provide written confirmation to Sasol, upon request by Sasol, that they have a programme in place to monitor their suppliers and subcontractors for compliance with this Code.

6 Acceptance of the Code of Conduct for suppliers

In the present and future commercial relations between Sasol and its suppliers, the supplier will be requested to accept and sign a written commitment to the principles provided in this Code of Conduct.

