

# GROUP GIFTS, ENTERTAINMENT AND HOSPITALITY POLICY



SASOL



From a governance and compliance perspective, Sasol is aligned with international standards, which require the Sasol Limited Board to serve as the focal point and custodian of corporate governance in the organisation, and to provide strategic oversight and, ultimately, govern compliance within the Sasol group. This policy sets out Sasol's Group Policy on gifts, entertainment and hospitality.

## OUR GOAL IS TO:

- Reinforce Sasol's commitment to ensuring ethical and trust-based business relationships with all our stakeholders, by establishing a clear and uniform policy relating to the acceptance and provision of gifts, entertainment and hospitality.
- Ensure that our policies uniformly apply to all Sasol employees, contractors and other business relationships.
- Provide guiding principles to assist our people in making appropriate decisions regarding the acceptance and provision of gifts, entertainment and hospitality.

## WE ARE COMMITTED TO:

- A zero tolerance approach to any unethical conduct, irrespective of how it affects the business.
- Evolving our code of conduct and ethical principles, to take into account the changing nature of the Sasol Group and the environment in which we operate.
- Setting a tone throughout the organisation that demonstrates our commitment to ethical business practices and fostering trust-based and credible relationships with our stakeholders.

## WE WILL ACHIEVE THESE FUNDAMENTALS THROUGH:

- Ensuring that gifts, entertainment or hospitality cannot be offered or accepted if it could influence, or be perceived to influence, a person's objectivity in doing their job.
- Avoiding expectations of reciprocity.
- Accepting and offering gifts, entertainment and hospitality that are:
  - in line with an authorised business purpose and local laws;
  - intended to promote our brand, products and services;
  - reasonable in nature and value;
  - offered in the normal course of business dealings; and
  - intended to build and strengthen business relationships.
- Not receiving or giving any gifts, entertainment or hospitality:
  - from parties engaged in a tender, competitive bidding, commercial negotiations, or selling process; and
  - exceeding the specified threshold, unless pre-approval has been obtained in accordance with the gifts, entertainment and hospitality guidance and pre-approval process note.

- 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.
- Avoiding giving or receiving 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.
- Taking precautionary measures by always consulting your Operating Model Entity (OME)-assigned Compliance Officer, the Governance Centre of Expertise within Legal, IP and Regulatory Services and obtaining approval from the Senior Vice President, prior to giving gifts or offering entertainment or hospitality to government officials.
- This policy is to be read together with the guidance and pre-approval process note related to this policy.

## APPROVAL AND REPORTING REQUIREMENTS REQUIRE THAT:

- Employees declare all gifts, entertainment and hospitality received or offered that can be perceived, individually or collectively, to create a conflict of interest or are in excess of US\$100, through the Sasol Declaration System (SDS), or where SDS is not available, through prescribed forms.
- Employees specifically note on their expense claims the purpose, nature and recipient of gifts, entertainment and hospitality provided to third parties.

## POLICY BREACH:

Non-adherence to this policy may lead to disciplinary action, in accordance with Sasol's approved disciplinary procedures and applicable legislative penalties and/or disciplinary action.

## EFFECTIVE DATE OF THIS POLICY:

This policy comes into effect on 1 June 2018.

**Bongani Nqwababa**  
Joint President and  
Chief Executive Officer

**Stephen Cornell**  
Joint President and  
Chief Executive Officer