



# Group Policy: Sasol Whistle-Blower Policy

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**Applicable to**  
All stakeholders who have dealings with Sasol

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Administration **To ensure the use of the authorised copy, the document must be downloaded from its authoritative source**

## **Approval**

Designation of approver **EVP Advisory, Assurance and Supply Chain**

Name of approver **V Kahla**

Date of approval **15 May 2020**

## 1. Introduction

Sasol is committed to conducting all aspects of its business with integrity and in compliance with the laws and regulations in the jurisdictions in which it operates. This commitment includes adhering to the ethical principles and behavioural standards described in the Sasol Code of Conduct, which applies uniformly to all wholly owned Sasol businesses, Sasol operated joint ventures, Employees and directors globally without exception, and Sasol commits all to consistently behave responsibly, honestly, fairly and respectfully.

Sasol promotes a culture in which all Stakeholders, especially Employees and Workers, are encouraged to speak up about unethical, illegal, or undesirable conduct involving Sasol and those engaged with it, without fear of retaliation or reprisal.

## 2. Purpose / Objective

- 2.1 Employees and Workers should feel comfortable speaking up without fear of retaliation when they see or suspect illegal or Unethical Conduct.
- 2.2 Sasol is committed to protecting all Stakeholders who report Unethical Conduct in good faith, from retaliation as a result of them making a Call Report.
- 2.3 This Policy is intended to encourage all Stakeholders who have dealings with Sasol to make Call Reports about any actual or suspected Unethical Conduct without fear of adverse consequences.
- 2.4 This Policy does not replace any legislation on the protection of Whistle-blowers or Reporters, and Stakeholders are encouraged to familiarise themselves with the specific legislation in their respective jurisdiction.
- 2.5 Subject to and in accordance with applicable laws and regulations, the objectives of this Policy are:
  - 2.5.1 to facilitate the detection, reporting, prevention of Unethical Conduct and to promote a culture of facilitating Call Reports about Unethical Conduct;
  - 2.5.2 to protect Employees from retaliation as a result of them having made a Call Report;
  - 2.5.3 to provide procedures for Stakeholders to disclose information relating to Call Reports;
  - 2.5.4 to ensure that Call Reports are appropriately investigated; and
  - 2.5.5 to ensure appropriate confidentiality protections for Reporter(s) and the Person(s) Implicated.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	2 of 9

### 3. Definitions

- 3.1 **“Call”** or **“Call Report”** refers to any formal report made about suspected or alleged Unethical Conduct, through any Formal Reporting Channel.
- 3.2 **“Employee”** is any person who has entered into a contract of employment with Sasol and who receives or received or is entitled to receive remuneration.
- 3.3 **“EthicsLine”** is externally managed by TOA and certified by the Ethics Institute SA as meeting the External Whistle-blowing Hotline Service Provider Standard EO1.1.1. The EthicsLine is a call centre which receives information from individuals and entities wanting to report possible Unethical Conduct to Sasol. It is available to individuals and entities within the Sasol Group as well as third parties. The EthicsLine enables the protection of the Reporters’ identity and also provides an independent official record of the issue being reported.
- 3.4 The **“Investigation Policy (GEO-V-2) and Procedure”** are formal Sasol documents that supplement this Policy, and which set out the policy and procedure in respect of how Sasol will investigate Call Reports.
- 3.5 **“Formal Reporting Channels”** are the authorised internal procedures in Sasol whereby Stakeholders can make disclosures of any alleged Unethical Conduct. The Formal Reporting Channels are further described in clause 7.1 of this Policy.
- 3.6 **“GEO”** is the Sasol Group Ethics Office; comprising of the Chief Compliance and Ethics Officer and team members employed directly in the Ethics Office.
- 3.7 **“good faith”** encompasses a sincere and reasonable belief that the information disclosed, and allegations contained are substantially true. It relates to coming forward with all the information you have about a situation that you believe violates the Sasol Code of Conduct, a Sasol policy or the law, and being motivated by a genuine concern or suspicion that unethical or unlawful conduct is occurring. Note that local laws applicable to Sasol operations may provide other requirements regarding whether a call report is made in good faith and thus if a Reporter is subject to protection from retaliation.
- 3.8 **“Person(s) Implicated”** or **“Implicated Person”** is the person(s) who is substantively accused of Unethical Conduct in a Call Report made through the Formal Reporting Channels. Being mentioned in a call does not necessarily make a person “implicated”.
- 3.9 This **“Policy”** is this Sasol Whistle-blower Policy.
- 3.10 **“Reporter(s)”** or **“Whistle- Blower”** is a Stakeholder(s) who makes a Call Report regarding alleged or potential Unethical Conduct to Sasol in good faith through the Formal Reporting Channels.
- 3.11 **“Sasol”** means Sasol Limited its subsidiaries and Sasol operated joint ventures.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	3 of 9

- 3.12 **“Stakeholder(s)”** include all directors, officers and Employees of Sasol, as well as all Workers and other persons (including applicants for employment, contractors, suppliers and any other third parties) who have dealings with Sasol.
- 3.13 **“TOA”** refers to Tip-Offs Anonymous, a division of Deloitte, who currently is the service provider that manages the EthicsLine independently and externally.
- 3.14 **“Unethical Conduct”** is any conduct which represents a transgression of any of the behavioural standards noted or described in the Sasol Code of Conduct, Sasol policies, and the Sasol Values, and breaches of laws and/or regulations; it includes but is not limited to criminal activity, misconduct, discrimination, harassment, conflicts of interest, theft, fraud, property damage, falsification, corruption or bribery, unlawful destruction of or tampering with Sasol official documents, financial misreporting, accounting, internal accounting controls or auditing concerns, internal business practices that are inconsistent with generally accepted accounting principles, collusion with competitors, data protection infringements, improper use of Sasol resources, insider trading, retaliation or victimisation for making a Call Report.
- 3.15 **“Worker”** means any person who works or worked for Sasol as an independent contractor, consultant, or agent or who renders services to Sasol while being employed by a temporary employment service.

#### 4. **Owner of this Policy**

The GEO is the custodian of this Policy, and the Senior Manager Ethics is the owner of this Policy.

#### 5. **Scope and Application**

- 5.1 This Policy applies to all Stakeholders.
- 5.2 In any country where this Policy conflicts with legislation, such local legislation shall override this Policy.
- 5.3 As a multinational organisation, Sasol is subject to different obligations relating to Whistle blowers or Reporters, and different protections and rights may be available to Whistle-blowers, under applicable laws and regulations of the jurisdictions in which Sasol has operations or a presence, under the rules or other requirements of any relevant stock exchange, or under any adopted rules, codes and standards. In applying this Policy, Sasol intends to meet its obligations under applicable law in the jurisdictions in which it operates.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	4 of 9

## 6. What to Report

- 6.1 The Sasol EthicsLine and ethics process should be used to:
- 6.1.1 report Unethical Conduct;
  - 6.1.2 raise concerns over any conduct that seems to violate a law, the Sasol Code of Conduct or another Sasol policy; or
  - 6.1.3 report a wrongdoing, misconduct, or behaviour that conflicts with generally accepted ethical standards.
- 6.2 The Sasol EthicsLine and ethics process should NOT be used to:
- 6.2.1 Report events which present an immediate threat to life or property. These emergency situations should be reported to the local authorities or Sasol security services;
  - 6.2.2 Report any personal work-related grievances that you may have in relation to your terms of employment that do not involve Unethical Conduct, as these must be referred to the Sasol Human Resources team unless that grievance relates to allegations of retaliation and/or the conduct has significant implications beyond the immediate relationship with the Reporter(s);
  - 6.2.3 Settle personal disputes; or
  - 6.2.4 Make accusations which you know are false.
- 6.3 The EthicsLine and ethics process should not be used by Reporters to bypass or circumvent any process that is already underway, (for example a grievance, arbitration, mediation, or legal action) or to replace other mechanisms put in place to manage certain workplace issues, for example the Sasol grievance process.
- 6.4 If the GEO becomes aware that the Call Report relates to an issue which is already in an official business or legal process, the GEO may elect to close the Call Report and allow the initial process to follow its natural course before deciding on further action if any. The Reporter will be advised that the Call Report has been closed.

## 7. How to make a Call Report

- 7.1 The authorised internal procedures at Sasol for receiving and dealing with Call Reports are known as the Formal Reporting Channels. The Formal Reporting Channels are:
- 7.1.1 Call Reports made to the EthicsLine;
  - 7.1.2 Call Reports made to or received by the GEO; and
  - 7.1.3 Call Reports received by or made to other members of the Sasol ethics community, namely Ethics Officers, Ethics Co-ordinators or Ethics Investigators.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	5 of 9

- 7.2 When engaging with the GEO or other members of the Sasol ethics community the Reporter should make it clear that they are making their disclosure within the terms of this Policy. This will ensure the recipient of the disclosure understands that the Reporter is making a Call Report and takes the necessary action to log the matter as such.
- 7.3 It is possible for an Employee or Worker to raise a concern related to Unethical Conduct with his or her line manager, however in order to have the Unethical Conduct investigated in accordance with this Policy the information related to the Unethical Conduct must also be recorded as a Call Report by using one of the Formal Reporting Channels mentioned above.
- 7.4 Every manager who receives a report regarding Unethical Conduct is expected to treat the concern or allegation with discretion, and to treat the Employee or Worker who brought the concern forward with respect. The manager is expected to escalate this concern to the Formal Reporting Channels.
- 7.5 If an Employee or Worker reports a concern of Unethical Conduct and is told to “keep quiet” by his or her manager or believes that the manager is not addressing the concerns in an appropriate manner, then the Employee or Worker should immediately contact one of the Formal Reporting Channels to report the concern as well as the manager’s pushback.
- 7.6 Reporters are encouraged to contact the EthicsLine directly as this will allow the Reporter to receive a call reference number for follow up purposes.
- 7.7 Investigations of Call Reports will be dealt with in terms of the Investigation Policy and Procedure.
- 7.8 The Sasol EthicsLine can be contacted on the following numbers:
- 7.8.1 Germany: 0800 183 0760
- 7.8.2 Mozambique: 800 112 233 (Toll free when using TDM network)  
800 333 312 (Toll free when using Vodacom network)
- 7.8.3 South Africa: 0800 016 017 (Toll free)
- 7.8.4 USA: 1800 489 1727 (Call charges may apply on certain mobile networks)
- 7.8.5 United Kingdom: 0808 273 4946

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	6 of 9

7.9 Or in writing using the following details:

**Africa and USA**

E-mail: [sasol@ethics-line.com](mailto:sasol@ethics-line.com)

Website: [www.sasolethics.com](http://www.sasolethics.com)

**Eurasia**

Website: [sasol ethicsline \(deloitte-halo.com\)](http://sasol.ethicsline(deloitte-halo.com))

7.10 Reporters should provide as much detail as possible of the alleged Unethical Conduct when making the Call Report. This should include but not be limited to:

7.10.1 The type of conduct that occurred -- in as much detail as possible, with any supporting documents, evidence or information;

7.10.2 When and how the Reporter became aware of it;

7.10.3 The names of those involved;

7.10.4 The names and contact details of any witnesses or persons who can provide additional information;

7.10.5 Dates, times, venues where the alleged conduct took place;

7.10.6 Whether the Unethical Conduct has been reported previously to anyone, and if so, was any action taken; and

7.10.7 How the Reporter can be contacted.

7.11 When contacting the EthicsLine, if permitted by applicable law, Reporters can (1) elect to remain completely anonymous, or (2) they can elect to provide their details to TOA only and request that these details are not provided to Sasol, or (3) they can agree that their details are provided to the GEO.

7.12 The GEO encourages Reporters to at least provide their contact details to TOA as it is often very difficult, if not impossible, to fully investigate Call Reports that are received anonymously.

7.13 If the GEO needs additional information to continue with its investigation and the details of the Reporter are not known, the GEO will request TOA to either make contact with the Reporter (if the contact details are known to TOA) to request additional information, or to post a request for further information on its website under the unique reference number, if the contact details of the Reporter are not known.

7.14 It is important that if a Reporter has elected to remain anonymous the Reporter should periodically check the TOA website or phone TOA for an update, as the GEO may have requested additional information to allow it to continue with its investigation.

7.15 If no further information, to allow the GEO to proceed with its investigation, is received from the Reporter, within two weeks, and the investigation is unable to continue based on the available information, then the GEO may unfortunately have to close the Call Report.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	7 of 9

## 8. Non-Retaliation

- 8.1 No Reporter may be subjected to retaliation as a result of having made a Call Report in good faith, even if the Call Report or concerns are proven unfounded by an investigation. Retaliation of any type against a Reporter who makes a Call Report in good faith will not be tolerated.
- 8.2 Additionally, no Employee or Worker shall be adversely affected because the Employee or Worker refuses to carry out an instruction that would constitute fraud or would be a violation of laws or the Sasol Code of Conduct.
- 8.3 Retaliation or victimisation can take many forms, whether directly or indirectly, as a positive act or an omission, whether expressly or tacitly and includes (but is not limited to) threats, intimidation, harassment, bullying, humiliation, or change in work responsibilities or conditions.
- 8.4 Should anyone within Sasol attempt to retaliate against or victimise a Reporter for speaking up and making a Call Report in good faith or victimise a witness or anyone else assisting in the investigation of the Call Report, then such person will face disciplinary action, up to and including dismissal.
- 8.5 Any Reporter or witness who suspects that they are being victimised or retaliated against as a result of having made a Call Report, or for assisting in an investigation, should immediately make another Call Report providing all the details of the alleged victimisation or retaliation.
- 8.6 Stakeholders who knowingly raise a misleading or false concern, or who raise a concern without a reasonable belief as to its truth or accuracy, will not be protected by this Policy and may be subject to a disciplinary process or other appropriate action.

## 9. Confidentiality

- 9.1 All persons who deal with the Call Reports and the investigation thereof are bound by strict confidentiality obligations.
- 9.2 At the election of the Reporter, if permitted by applicable law, Reporters may remain anonymous.
- 9.3 At no time may the identity of the Reporter, or any elements allowing for the identification of the Reporter, be disclosed without the Reporter's prior consent, unless Sasol is required by law to disclose such information.
- 9.4 Relevant information in respect of the Call Report will only be shared on a need to know basis and only with observance of appropriate confidentiality protections.
- 9.5 While Sasol can provide internal anonymity, it cannot guarantee this will be retained if external legal action flows from the disclosure.

## 10. The Investigation Process

- 10.1 Once a Call Report is received by the EthicsLine it will be forwarded to the GEO for appropriate investigation.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	8 of 9

- 10.2 The EthicsLine will provide the Reporter with a unique reference number which must be used when contacting the EthicsLine for any feedback or updates.
- 10.3 The GEO will assess the Call Report and if it relates to Unethical Conduct allocate it for investigation as appropriate.
- 10.4 If the GEO is of the view that the Call Report does not relate to Unethical Conduct, it will refer the Call Report back to TOA and request that the Reporter be advised that the call does not fall within the scope of the EthicsLine and that it will not be investigated.
- 10.5 If the GEO allocates the Call Report for investigation the Reporter may, subject to the applicable laws, be advised by the EthicsLine that the call has been allocated for investigation.
- 10.6 Once the Call Report has been investigated, Sasol may, subject to applicable law, provide appropriate feedback via the EthicsLine as to the outcome of the investigation.
- 10.7 It is possible that the Reporter may not be involved in the investigation, however Sasol takes all reports of Unethical Conduct seriously and Reporters are assured that all Call Reports will be investigated appropriately, neutrally and without bias for the parties involved.

**11. Questions**

Any questions in respect of this Policy or its application should be referred to:

- The relevant Sasol Ethics Officer;
- the Group Ethics Office;
- Employee Line Managers; or
- Visit the Sasol website.

Document number	Revision number		Page number
GEO WB1	0	Date Printed: 12/06/2020 12:13:37	9 of 9