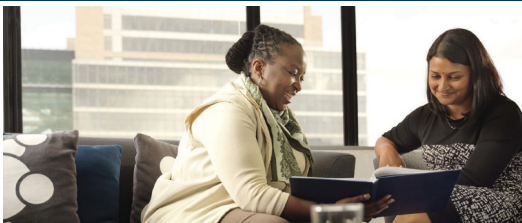


Sasol Human Rights Policy



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Document owner	VP: Compliance, Ethics and Governance
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Administration	This Human Rights Policy will be administered by Sasol's Human Rights team or such other function determined by the Sasol's Executive Vice President: Commercial and Legal
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This Human Rights Policy applies to the Sasol group of companies as a whole, inclusive of all employees, non-permanent employees and service providers of Sasol Limited and its subsidiaries. This Policy also applies to Sasol's joint ventures, to the extent that Sasol has majority shareholding and/or management control and subject to the acceptance and approval thereof by their respective boards of directors or other responsible corporate decision-making body. We expect entities in which Sasol does not have majority shareholding and/or management control as well as suppliers, to uphold this Human Rights Policy or such similar policy as may apply in any of their business. In addition to meeting all applicable legal requirements, we encourage them to uphold our Human Rights Policy and/or implement similar policies within their own businesses.

1. Our Human Rights Commitments

1.1 Introduction

As a global energy and chemicals company, Sasol recognises that respect for human dignity and the rights of all people, as explained in the Universal Declaration of Human Rights, is critical for the sustainability of its business.

We commit to respect and uphold Human Rights by:

- avoiding, or mitigating if not possible to avoid, adverse Human Rights impacts that we may cause or contribute to through, our business activities and business relationships with Employees, communities, joint venture (JV) and business partners, customers, suppliers and service providers; and
- doing business based on fair, lawful and transparent practices.

1.2 Definitions

- **Employee** means any person who has entered into a contract of employment with Sasol and who receives or is entitled to receive remuneration, and includes all executive directors and officers;
- **Human Rights** means all internationally recognised human rights including, at a minimum, the rights and freedoms set out in the 1948 Universal Declaration of Human Rights and codified through the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights and the eight core conventions of the International Labour Organisation;
- **Modern Slavery** refers to when an individual is exploited by others, for personal or commercial gain, whether tricked, coerced, or forced, so to lose their freedom and includes but is not limited to, human trafficking, forced labour and debt bondage, child slavery, forced marriages and descent based slavery; and
- **Sasol** means Sasol Limited and its subsidiaries and other group companies.

1.3 Application of international standards

Supported by internal organisational policies and directed by international standards and applicable laws within which Sasol operates including those laws prohibiting Modern Slavery, Sasol commits to respect the:

- International Bill of Human Rights;
- Universal Declaration of Human Rights;
- United Nations' (UN) Guiding Principles on Business and Human Rights (UNGPs);
- Ten Principles of the UN Global Compact (UNGC), as a signatory to the UNGC;
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines);
- UN Sustainable Development Goals;
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO);
- International Finance Corporation (IFC) Performance Standards on Land Acquisition and Involuntary Resettlement and Indigenous Peoples;
- UN Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Service Providers;
- OECD Guidelines for Multinational Enterprises;
- the UN Declaration on the Rights of Indigenous Peoples; and
- International humanitarian law.

We encourage our business partners, suppliers and service providers to commit to compliance with sound Business and Human Rights principles, including, where applicable within the extractive industry, to commit to respect the UN Voluntary Principles on Security and Human Rights.

1.4 Our Commitments

We are committed to:

- **Respecting diversity**
subject to the laws and other regulatory requirements that apply in jurisdictions in which Sasol operates, respecting diversity, ensuring equal opportunities and eradicating discriminatory practices
- **Fair labor practices**
providing conditions of employment, remuneration, wages and benefits that are fair and competitive
- **Safe, secure and healthy working environment**
maintaining safe, secure and healthy working environments and conditions that do not infringe on Human Rights
- **Freedom of association and right to collective bargaining**
upholding the freedom of association and the right to collective bargaining
- **Environmental footprint**
responsibly managing our environmental footprint
- **Supply chain**
addressing Human Rights impacts identified within our supply chains
- **Mergers and Acquisitions (including JVs)**
encouraging our JV and business partners to uphold this Human Rights Policy and/or implement similar policies within their own businesses
- **Rights of communities and indigenous peoples**
respecting the rights of communities close to where our operations are located and indigenous peoples that may be affected or impacted by our business activities, including land tenure and access to water rights
- **Stakeholder management**
engaging and collaborating with our stakeholders and soliciting feedback to enhance our performance on Human Rights, associated stakeholder engagement and social value creation. We further commit to respecting the rights of Human Rights defenders and not to hinder or inhibit their peaceful and safe civic engagement
- **Data Privacy**
respecting the fundamental right to privacy of all our stakeholders and further commit to processing personal data lawfully, ethically and securely
- **Anti-Bribery and Corruption**
acting with integrity, opposing corruption and dishonesty in any form in accordance with our Anti Bribery Policy
- **Grievance Mechanisms**
remedying or facilitating access to remedy any adverse Human Rights impacts that we may identify to have caused or contributed to through our operations, without obstructing access to any other remedies that may be available. We commit to collaborating with applicable judicial and non-judicial mechanisms, and working with our business partners as appropriate, in relation to the provision of appropriate access to remedy

2. Our Human Rights focus areas

Our Human Rights impacts which have been identified as being most salient to Sasol, are broken down into the following categories:

Respecting diversity	▪ Subject to the laws and other regulatory requirements that apply in jurisdictions in which Sasol operates, Sasol promotes diversity, equity and inclusion in the workplace, in accordance with the principles applicable in open and democratic societies, based on human dignity, equality and freedom. Our aim is to ensure that we attract and retain the skills we need to deliver on our strategic objectives. We commit to applying labour policies and practices that are fair and in line with local legal requirements and the core conventions of the ILO, which sets international standards on labour matters such as the payment of living wages and support of employee wellbeing including overtime that is voluntary and paid at a rate that is compliant with applicable laws. ▪ To promote diversity, equity, inclusion and belonging in the workplace, we place a special focus on gender equity, the inclusion of people with disabilities, employment equity and skills development, inclusive culture and practices.
Safe and healthy working environment	▪ Safety is not only a non-negotiable but the bedrock of a sustainable business. We commit to providing a safe working environment and fulfilling our commitment to achieving Zero Harm while maintaining production of high-value products. ▪ We commit to: ▪ enabling safe, adequate working conditions and enduring operations, whilst prohibiting forced labour and child labour; ▪ aligning our security procedures with the UN Voluntary Principles on Security and Human Rights, and the International Code of Conduct for Private Security Service Providers; ▪ as aligned with our organisational human resources and whistleblower policies and applicable protected disclosure laws, prohibiting discrimination, retaliation, reprisal, intimidation, violence, abusive behaviour, harassment and victimization against any person who, in good faith, reports or raises concerns regarding suspected Human Rights violations; ▪ providing appropriate grievance mechanisms, both internally and externally, and seeking to ensure that Human Rights concerns and complaints are appropriately investigated and reported without impeding on State-based judicial and non-judicial grievance mechanisms, which provide for access to remedy. Complainants are not required to waive their legal rights; and ▪ maintaining constructive relationships and partnerships with representative trade unions and works councils in all the jurisdictions where we operate, while respecting the freedom of association and corresponding rights.

Supply chain	▪ We proactively assess Human Rights impacts, both within our operations and supply chain. We develop and inform suppliers and service providers on environmental, social and governance requirements. We hold our suppliers and service providers to the same standard that we hold ourselves. Our approach towards economic growth entails embracing principles of sustainability through socially and environmentally responsible procurement practices. ▪ In line with our organisational policies such as the Sasol Code of Conduct, Supplier Code of Conduct, the Sasol Anti-Bribery Policy and Conflict of Interest Policy, we expect and require our suppliers and service providers to act with integrity, to oppose any unlawful or unethical activities, and to raise awareness about Human Rights principles within their organisations, including training on Human Rights issues. ▪ Sasol is opposed to any form of Modern Slavery or human trafficking. We encourage all our Employees and all our other stakeholders to 'speak up' against any suspicious unethical behaviour and economic crime related activities to ensure that Sasol and our suppliers and serviced providers, adhere to the provisions and principles of ethical sourcing and procurement.
Respecting the rights of communities and indigenous peoples	▪ We respect the rights, customs and cultures of communities and indigenous peoples with whom we interact in the course of our business. We: ▪ collaborate with and minimize negative effects on communities close to where our operations are located as informed by due diligence or impact assessments; ▪ acknowledge and respect land rights and take a risk-based approach to the use of resources with due consideration for communities close to where our operations are located and indigenous peoples and the environment; ▪ avoid involuntary resettlements through our project designs; ▪ mitigate security-related Human Rights impacts by aligning processes and procedures with the UN Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Providers; and ▪ balance cultural heritage, community expectations, economic development and environmental impacts. ▪ In managing any resettlement of a community, we commit to comply with local applicable laws and the IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement, as well as the United Nations' and other voluntary guidelines on land tenure rights. ▪ When we consult with indigenous peoples, we commit to the application of the international guidelines including the IFC Performance Standard 7 on Indigenous Peoples and the UN Declaration on the Rights of Indigenous Peoples. We commit to obtain free, prior and informed

	consent from indigenous peoples and communities for transaction(s) involving land and natural resources, in line with the expectations of the UN Declaration on the Rights of Indigenous Peoples, and in compliance with applicable laws. ▪ Sasol further requires its business partners in relation to land tenure rights, to commit to obtain free, prior and informed consent in line with the UN Declaration on the Rights of Indigenous Peoples, in compliance with applicable local laws, and to commit to respect access to water rights. ▪ Our stakeholder engagement processes ensure that Sasol is well placed to receive concerns from communities and indigenous peoples, to assess the existence of Human Rights impacts.
Managing Sasol's environmental footprint	▪ We are committed to implementing a risk-based approach towards the responsible use of environmental resources and address our environmental challenges with due consideration for the rights and interests of all our stakeholders, including communities and indigenous people. ▪ We are cognisant of the diversity of our environmental compliance obligations across the numerous jurisdictions in which we operate. This is demonstrated by our adherence to applicable local and international laws, regulations and standards. We follow a robust process of reporting and mitigating environmental incidents, including any deviations from legal requirements. Our approach is based on an incident classification system which includes assessing incidents based on their potential to create significant degradation or pollution to the environment. We collaborate with the authorities on environmental inspections conducted at our facilities. Our responses to findings include key remedial interventions aimed at sustaining compliance. ▪ Following our product stewardship approach, we seek to ensure that our procurement of chemicals and raw materials does not support conflict, complies with law, and as far as possible, limits the impact on human health and the environment.

3. Our Human Rights governance and management

3.1 Roles and responsibilities

- the board of directors of Sasol Limited (Board) has the ultimate responsibility for overseeing Sasol's commitment to respect Human Rights in line with Sasol's policies;
- the Sasol Safety, Social and Ethics Committee (SSEC), a Board sub-committee, is responsible for overseeing the implementation of Sasol's Business and Human Rights Framework (BHR Framework) and the overall Sasol's approach to Human Rights; and
- Sasol's Executive Vice President: Commercial and Legal has executive responsibility for ensuring the implementation of Sasol's Business and Human Rights programme. An internal Human Rights team enables this implementation across the organisation.

The responsibility for implementing Sasol's Human Rights programme and the related processes and procedures including embedding actions to advance Sasol's approach on human rights within business operations, resides with the leadership of each Operating Model Entity ("OME") within Sasol. The OME leadership is responsible for the operational implementation of Human Rights due diligence requirements as well as ensuring compliance with Human Rights training requirements by the identified target Employees.

It is the responsibility of Employees to know and understand the Human Rights obligations and/or requirements set out in this Policy. Employees are required to immediately report any non-compliance with this Policy to their line manager, legal advisor or through the Sasol EthicsLine.

3.2 Human Rights due diligence

Sasol is committed to uphold and respect Human Rights in all of its business activities and its business relationships. In order to meet its responsibility to respect Human Rights, Sasol maintains due diligence processes in terms of which potential Human Rights impacts including Modern Slavery risks are identified, managed and reported.

3.2.1 Self-Assessment Questionnaire on Business and Human Rights

Sasol has in place a Self-Assessment Questionnaire on Business and Human Rights (Questionnaire), used internally to identify and assess potential Human Rights impacts including potential Modern Slavery risk exposures, that might arise as a result of and/or in connection with its business operations or its business relationships.

The Questionnaire is completed by each OME biennially or as and when there is a change in the OME's business activities or strategy and is assessed by the Sasol's Business and Human Rights team to identify potential Human Rights impacts and to ensure that adequate and effective mitigating control measures are put in place.

3.2.2 Supply chain due diligence

We strive for excellence in the sustainable supply and delivery of goods, services and products to maximise value for our organisation and our customers. We are opposed to any form of Modern Slavery and human trafficking in our supply chains or in any part of our business.

Sasol seeks to mitigate potential Human Rights impacts occurring in its business and supply chains as a matter of principle, to protect its reputation as a corporate citizen with ethical values and to avoid operational and legal risks including financial loss associated with such criminal conduct.

We acknowledge that the conduct of our business partners within our supply chains affects Sasol and therefore we will only do business with business partners that demonstrate integrity and align with our values.

We seek to ensure that our supply chain business partners operate in accordance with applicable laws, as well as the Sasol Code of Conduct, Supplier Code of Conduct and this Human Rights Policy.

Our Code of Conduct provides guidance on how we conduct our business, including affirming Sasol's commitment to fair labour practices in line with applicable legal requirements and the eight ILO core conventions. Our Supplier Code of Conduct is explicit in requiring that Sasol suppliers and service providers must not participate in, or benefit from, any form of forced labour and/or child labour, and we expect our suppliers and service providers to apply similar requirements with their own suppliers and service providers.

In this regard, Sasol has developed a risk-based Business and Human Rights Due Diligence Questionnaire for Suppliers (BHR DDQ), which is used to, in relation to a supplier or service provider:

- identify potential Human Rights risks;
- demonstrate the steps a supplier has taken to effectively identify and manage human rights risks; and
- facilitate engagement with Sasol on human rights related issues for the purpose of addressing and managing identified key risks or challenges.

The BHR DDQ responses are reviewed in terms of the Business and Human Rights Risk Matrix, in terms of which a supplier or service provider is assessed and categorised based on the potential Human Rights risk it may pose to Sasol, taking into account the responses by a supplier or service provider to the BHR DDQ, background screening and other available public information, to ensure that appropriate risk mitigation actions are taken.

In order to minimise the risk of non-compliance with Human Rights obligations and requirements, OMEs are required to:

- apply a risk-based approach in implementing the BHR DDQ for their prospective and existing suppliers, and before entering into new business relations with third parties in all jurisdictions where Sasol is operating its business;
- embed the BHR DDQ within their supplier screening and due diligence review processes and/or mitigation controls which include BHR contractual provisions;
- assess human rights risks and categorise suppliers based on the supplier's responses to the BHR DDQ, background screening and other information, which will form part of the contracting and onboarding process of suppliers or establishing new business relations with third parties; and
- the supplier's risk category will determine the appropriate steps that the OME must take to mitigate the human rights risk posed by that supplier.

It is the responsibility of each OME's leadership to ensure that the above-mentioned screening and due diligences review processes are performed, and a risk-based approach is followed in such performance. Should the OME want to proceed with a transaction despite red flags with respect to specific human rights risks being identified during due diligence review process, such a transaction will be approved by the OME leadership, in consultation with Legal, Intellectual Property and Compliance, and only in the event that the

OME concerned has a credible plan to effectively mitigate such risk or lower its probability or likelihood of occurrence.

3.2.3 Human Rights due diligence in transactions

To mitigate against potential legal, financial, operational and reputational risks that may arise as result of a failure to respect Human Rights by Sasol or its business partners, Sasol embeds Human Rights considerations into its due diligence and decision-making relating to mergers and acquisitions (M&A), JVs and other transactions with its business partners.

The Sasol M&A Due Diligence Guidance on Human Rights sets out the Human Rights considerations that Sasol takes into account during M&A and JV due diligence processes. Potential JV partners are required to complete a Human Rights due diligence questionnaire in order to do business with Sasol.

3.2.4 Customer Due Diligence

Sasol acknowledges its responsibility to identify, prevent, mitigate, and account for how it addresses adverse Human Rights impacts linked to its relationships with customers, clients, or other third-party purchasers and end users. This includes foreseeable adverse Human Rights impacts associated with any Sasol product's intended use, its misuse, as well as dual use.

Sasol prioritises product safety and takes account of any potential misuse of its product to avoid and to mitigate, to the extent possible, against any Human Rights impacts which may occur from any unintended use or misuse of its products, some of which are hazardous and could potentially (depending on the circumstances) be grave and irremediable.

Sasol, through its Product Stewardship and Responsible Care department and the internal Toxicology and Risk Assessment Group, is committed to producing and delivering products that are safe for humans and the environment, having regard to their intended use.

3.3 Training and awareness

Sasol has implemented and continuously maintains an effective Human Rights training and awareness programme, for the purposes of developing and promoting a common responsibility to uphold Human Rights.

Sasol biennially, provides Human Rights training to those of its Employees, who have been identified as target audience for such training.

We apply a risk-based approach to our Human Rights training programme, to ensure that Employees identified as the target audience for such training:

- understand the risks associated with the violation of Human Rights, human trafficking and slavery;
- understand their responsibility to ensure compliance with this Policy and any other Human Rights related processes and procedures implemented by Sasol from time to time; and
- receive appropriate and effective role specific Human Rights training to enable them to carry out their responsibilities.

It is the responsibility of an OME to identify training needs within each OME and ensure that Employees identified as within the target audience for such training, complete the relevant mandatory Human Rights training.

Where applicable, Sasol also provides Human Rights training to its suppliers, to ensure that suppliers are aware of their responsibilities to uphold and respect Human Rights.

3.4 Grievance mechanisms and remediation

In line with our Code of Conduct, Sasol is committed to the prohibition and eradication of all forms of discrimination, retaliation, reprisal, intimidation, harassment and victimisation against a person, who in good faith, makes a report or raises a concern that he or she reasonably believes to be a violation of Human Rights.

Sasol will not tolerate, contribute to or support any form of retaliation or threats against its Employees, workers of business partners and/or any other person (including their representatives), who raise allegations of adverse Human Rights impacts relating to Sasol and its business operations, including the making of any threat of legal action solely to intimidate a person who has made a credible, good-faith allegation or complaint.

Sasol is also committed to respecting the rights of Human Rights defenders and to not hinder or inhibit their peaceful and safe civic engagement.

Sasol has in place grievance mechanisms, both internally and externally, to ensure that Human Rights concerns and complaints are appropriately investigated and reported without impeding on State-based judicial and non-judicial grievance mechanisms. Such concerns and complaints are investigated timeously to determine their validity where appropriate and possible, and appropriate corrective actions are taken as required. Sasol commits to collaborating with applicable judicial and non-judicial mechanisms, and working with our business partners as appropriate, in relation to the provision of appropriate access to remedy.

The Sasol EthicsLine is a confidential and independent system available in a number of languages, 24 hours a day and seven days a week and allows any person to anonymously report any suspected transgression of the Sasol Code of Conduct, Sasol values, Sasol policies and laws and/or regulations including in relation to human rights matters. Details of the Sasol EthicsLine can be found on the Sasol corporate website (Sasol EthicsLine) and on the Sasol intranet.

Approval

Designation of approver

Sasol President and Chief Executive Officer

Name of approver

Simon Baloyi

Signature

RECORD OF AMENDMENTS AND REVISIONS

Amendment record

Revision number	Date	Status / change
001	19 April 2022	To ensure alignment to applicable international standards
002	01 October 2025	To comprehensively articulate Sasol's Human Rights commitments and salient Human Rights impacts