



Group Policy

Sasol Whistle-Blower Policy

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1. INTRODUCTION

- 1.1 Sasol is committed to conducting all aspects of its business with integrity and in compliance with the applicable 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.
- 1.2 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, Workers and Stakeholders 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 Employees, Workers and Stakeholders who report Unethical Conduct in Good Faith, from retaliation as a result of them making a Call Report.
- 2.3 This Policy is subject to the whistleblower laws that apply in the jurisdictions in which Sasol operates and is intended to encourage all Stakeholders who have dealings with Sasol including Employees and Workers to make Calls about any actual or suspected Unethical Conduct without fear of adverse consequences.
- 2.4 The manner in which disclosures that are made in terms of this Policy are handled may differ according to the applicable laws in the jurisdictions where Sasol operates. In any country where this Policy conflicts with local legislation, such local legislation shall override this Policy. 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 to:
 - 2.5.1 facilitate the detection, reporting, prevention of Unethical Conduct and to promote a culture of facilitating Calls about Unethical Conduct,
 - 2.5.2 protect Employees, Workers and Stakeholders from retaliation as a result of them having made a Call,
 - 2.5.3 provide procedures for Stakeholders, Employees and Workers to disclose information relating to Calls,
 - 2.5.4 ensure that Calls are appropriately investigated, and
 - 2.5.5 ensure appropriate confidentiality protections for Reporter(s) and the Implicated Person(s).

3. DEFINITIONS

- 3.1 **"Call(s)" or "Call Report(s)"** refer(s) to any formal report(s) made about suspected or alleged Unethical Conduct, through any of the Formal Reporting Channels.
- 3.2 **"Chief Ethics Officer"** refers to a VP who is responsible for Compliance, Ethics and Governance.
- 3.3 **"Employee(s)"** refer(s) to any person(s) who has/have entered into contract(s) of employment with Sasol and who receive(s) or is/are entitled to receive remuneration and include(s) executive director(s).
- 3.4 **"Ethics Community"** comprises of the Chief Ethics Officer, employees of the GEO, OME Ethics Officers, Ethics Co-ordinators and Ethics Investigators.
- 3.5 **"Ethics Co-ordinator(s)"** refer(s) to Sasol Employee(s) responsible for assisting the OME Ethics Officer(s) in managing Calls at business, operational and functional entity level.
- 3.6 **"EthicsLine"** is:
- 3.6.1 a call center which receives information from individuals and entities wanting to report possible Unethical Conduct relating to Sasol;
 - 3.6.2 externally managed by TOA for Calls originating in South Africa, Mozambique and US, except for Calls originating from Europe and China, which are captured via the Halo system;
 - 3.6.3 certified by The Ethics Institute of South Africa as meeting the External Whistle-blowing Hotline Service Provider Standards EO 1.1.1; and
 - 3.6.4 available to individuals and entities within the Sasol Group of Companies as well as third parties and enables the protection of the Reporter's identity and provides an independent official record of the issue being reported.
- 3.7 **"Ethics Investigator(s)"** refer(s) to the *ad-hoc* role of Employee(s) who is/are appointed by the OME Ethics Officer(s) on a temporary and case-by-case basis to conduct ethics investigations.
- 3.8 **"Ethics Investigation Policy and Ethics Investigation Procedure"** refer to formal Sasol documents that supplement this Policy and set out the policy and procedure in respect of how Sasol will investigate Calls.
- 3.9 **"Formal Reporting Channel(s)"** refer(s) to the authorised internal procedure(s) within Sasol whereby Employees, service providers or third parties can make protected disclosure(s) of any alleged Unethical Conduct, and the Formal Reporting Channels are further described in clause 7.1 of this Policy.
- 3.10 **"GEO"** is the Sasol Group Ethics Office, comprised of the Chief Ethics Officer and team members employed directly in that office.
- 3.11 **"Good Faith"** encompasses a sincere and reasonable belief that the information disclosed and allegations made are substantially true, and relate to coming forward with all the information that one has about a situation that he/she believes violates the Sasol Code of Conduct, Sasol policies or the laws, and being motivated by a genuine concern or suspicion that Unethical Conduct or unlawful conduct is

occurring and local laws applicable to Sasol operations may provide other requirements regarding whether a Call is made in good faith and thus, if a Reporter is subject to protection from retaliation.

- 3.12 **"Halo system"** refers to a Deloitte European system which covers the requirements of the European Law standards and certification (e.g. ISO270001) including the requirements of the European Union ("EU") Directive on the protection of persons reporting infringements of EU law (EU 2019/1937), and a web-based reporting and voice-box solution in the languages used by Sasol in the EU and China.
- 3.13 **"Implicated Person(s)"** refer(s) to person(s) who is/are substantively accused of Unethical Conduct in Call Report(s) made through the Formal Reporting Channels, and being mentioned in a call does not necessarily make a person "implicated".
- 3.14 **"OME(s)"** refers to any Sasol Operating Model Entity(ies) which include(s) Business Support function(s) and associated function(s) as well as direct and/or indirect subsidiaries linked to the Sasol Group of Companies operating anywhere in the world.
- 3.15 **"OME Ethics Officer(s)"** refer(s) to Sasol employee(s) usually at the Group Executive Committee 2/3 level, who is/are appointed in writing by the SVP to support and assist the GEO with *inter alia* managing and investigating Call Reports allocated to the OME(s).
- 3.16 **"Policy"** is this Sasol Whistle-Blower Policy as detailed herein and approved as per Sasol's delegation of authority document.
- 3.17 **"Reporter(s)"** or **"Whistle-Blower(s)"** refer(s) to Stakeholder(s) including Employees, service providers or third parties who make(s) Call(s) regarding alleged or potential Unethical Conduct to Sasol in Good Faith through the Formal Reporting Channels.
- 3.18 **"Sasol"** means Sasol Limited, its subsidiaries and Sasol operated joint ventures.
- 3.19 **"Sasol Group of Companies"** means Sasol Limited and all its subsidiaries.
- 3.20 **"Stakeholder(s)"** refer(s) to director(s), officer(s) and Employee(s) of Sasol, as well as all Worker(s) and other person/s (including applicant/s for employment, contractor(s), supplier(s), customer(s), partner(s) and any other third party/ies) who has/have dealings) with Sasol.
- 3.21 **"SVP"** refers to a Senior Vice President of the relevant OME.
- 3.22 **"TOA"** refers to Tip-Offs Anonymous, a division of Deloitte, which is the service provider that is currently managing the EthicsLine for Sasol independently and externally.
- 3.23 **"Unethical Conduct"** refers to 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 and this includes but is not limited to criminal activity, general misconduct, discrimination, harassment, conflict 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, privacy and

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data protection infringements, improper use of Sasol resources, insider trading, human rights abuses/violations/infringements, data protection infringements, improper use of Sasol resources, insider trading, safety health and environmental violations, procurement matters related to black economic empowerment and fronting, allegations against Sasol contractors, retaliation or victimisation for making a Call Report.

3.24 "**VP**" refers to a Vice President of the relevant OME.

3.25 "**Worker(s)**" mean(s) any person(s) who work(s) or worked for Sasol as independent contractor(s), consultant(s), or agent(s) or who render(s) service(s) 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.

5. SCOPE AND APPLICATION

5.1 This Policy applies to all Stakeholders.

5.2 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 has a presence, under the rules or other requirements of any relevant stock exchange, or obligations following any adopted rules, codes and standards. In applying this Policy, Sasol intends to meet its obligations under applicable laws in the jurisdictions in which it operates.

5.3 In any country where this Policy conflicts with legislation, such local legislation shall override this Policy.

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 violates laws, the Sasol Code of Conduct or any Sasol policy; or

6.1.3 report any 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 the Employee may have in relation to his/her 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 or victimisation;

- 6.2.3 report Sasol retail sites customer services complaints. These complaints should be reported to the Sasol Customer Services Centre;
 - 6.2.4 make Calls in bad faith which include, but not limited to, settling personal disputes, making accusations which the Employee knows are false, seeking revenge for personal or work-related matters; and
 - 6.2.5 bypass or circumvent any business or legal process that is already underway, (for example a complaints resolution, 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.
- 6.3 If the GEO becomes aware that the Call relates to an issue which is already in an official business or legal process, the GEO may elect to close the Call 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 has been closed.

7. HOW TO MAKE A CALL REPORT

- 7.1 The authorised internal procedures/processes at Sasol for receiving and dealing with Calls are known as the Formal Reporting Channels which include the following:
- 7.1.1 Calls made to the EthicsLine;
 - 7.1.2 Calls made to or received by the GEO; and
 - 7.1.3 Calls received by or made to other members of the Sasol Ethics Community.
- 7.2 When engaging with the GEO or other members of the Ethics Community, the Reporter should make it clear that he/she is making a Call. This will ensure that the recipient of the disclosure understands that the Reporter is making a Call and takes the necessary action to log the matter as such.
- 7.3 It is possible for Employees or Workers to raise concerns related to Unethical Conduct with their line managers, as such line managers are often the first resource for Employees who have questions on ethical issues or potential violations of Sasol policies. 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 line manager who receives a Call 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 and not respond in a retaliatory manner. The line 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/her line manager or believes that the line 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 line manager’s pushback.

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- 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 Ethics Investigation Policy and Ethics Investigation Procedure.
- 7.8 Set out below is a reporting process to be followed when contacting the Sasol EthicsLine in Eurasia:
- 7.8.1 Deloitte manages the EthicsLine in Eurasia via the Halo System which is a web-based whistleblowing system that provides a confidential reporting channel as required by EU Directive 2019/1937. Via the Halo System, all the relevant information is passed on to Sasol, with the Call Report being completely confidential, and personal data of the reporting person is protected in accordance with applicable privacy and data protection laws;
- 7.8.2 **the Sasol EthicsLine can be contacted via voice box on the following numbers:**
- 7.8.2.1 France: 0805980323,
- 7.8.2.2 Germany: 0800 183 0760,
- 7.8.2.3 Italy: 800 939 098,
- 7.8.2.4 Netherlands 0800 0224948,
- 7.8.2.5 Singapore: 800 492 2268,
- 7.8.2.6 Hong Kong: 800 902 050,
- 7.8.2.7 Slovakia: 0800 232 022,
- 7.8.2.8 Spain: 900 751 262,
- 7.8.2.9 UK: 0808 273 4946, and
- 7.8.2.10 China: 400 878 5992;
- 7.8.3 **or in writing using the following details:**
- 7.8.3.1 https://eu.deloittehalo.com/whistleblower/website/Sasol_EthicsLine for Eurasia excluding China,
- 7.8.3.2 https://tip-offs.com.cn/sasol_ethicsline/ for China; and
- 7.8.3.3 interactions can be done in different languages, including English, German, Italian, French, Dutch, Spanish, Slovakian, and Mandarin;
- 7.8.4 choose level of anonymity as set out below:
- 7.8.4.1 **Confidential** - Your personal data will be disclosed in the Call Report,

- 7.8.4.2 **Partially Anonymous** - Your personal information will only be disclosed to Deloitte and not in the Call Report to Sasol, and
 - 7.8.4.3 **Anonymous** - You remain completely anonymous;
 - 7.8.5 entering the disclosure by filling in the fields that are in the form. Be sure to also make a note of your disclosure identity and password to log in again;
 - 7.8.6 log in again to receive updates or add additional information and the Employee can log in again at any time with his/her password and disclosure identity; and
 - 7.8.7 after ninety days at the latest, the Employee will receive final feedback on the outcome of the case.
- 7.9 Set out below is the reporting process to be followed when contacting the Sasol EthicsLine in Africa or the United States of America (USA):
- 7.9.1 **the Sasol EthicsLine can be contacted on the following numbers:**
 - 7.9.1.1 South Africa: 0800 016 017 (toll free),
 - 7.9.1.2 Mozambique: 0800 333 312 (Toll free when using Vodacom network) and +27119293332 (Toll free Call Back Facility – Accessible from most mobile networks), and
 - 7.9.1.3 USA: 1800 490 9129 (Call charges may apply on certain mobile networks);
 - 7.9.2 or in writing using the following details:
 - 7.9.2.1 E-mail: sasol@ethics-line.com, and
 - 7.9.2.2 Website: www.sasolethics.com;
 - 7.9.3 interactions can be done in different languages, including English, Afrikaans, Zulu, Sotho, Xhosa, Pedi, Venda, Tsonga, Tswana, SiSwati, Ndebele and Portuguese;
 - 7.9.4 choose your level of anonymity as set out below:
 - 7.9.4.1 **Confidential** - Your personal data will be disclosed in the report,
 - 7.9.4.2 **Partially Anonymous** - Your personal information will only be disclosed to TOA and not in the Call Report to Sasol, and
 - 7.9.4.3 **Anonymous** - You remain completely anonymous;
 - 7.9.5 submit your Call,
 - 7.9.6 you will be provided with a reference number which will be required when contacting the EthicsLine to receive updates or add additional information on your Call Report,
 - 7.9.7 the following information is required from the Reporters when they contact the EthicsLine to make a Call Report:

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- 7.9.7.1 the Reporters should provide as much detail as possible about the alleged Unethical Conduct when making Call and this should include but not be limited to:
 - 7.9.7.1.1 the type of conduct that occurred and in as much detail as possible, with any supporting documents, evidence or information,
 - 7.9.7.1.2 when and how the Reporter became aware of it,
 - 7.9.7.1.3 the names of those involved,
 - 7.9.7.1.4 the names and contact details of any witnesses or persons who can provide additional information,
 - 7.9.7.1.5 date(s), time(s) and venue(s) where the alleged Unethical Conduct took place,
 - 7.9.7.1.6 whether the Unethical Conduct has been reported previously to anyone, and if so, whether any action was/has been taken, and
 - 7.9.7.1.7 how the Reporter can be contacted;
- 7.9.8 the GEO encourages the Reporters to at least provide their contact details to TOA or Deloitte as it is often difficult, if not impossible, to fully investigate Calls that are received anonymously;
- 7.9.9 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 or Deloitte to either make contact with the Reporter (if the contact details are known to TOA or Deloitte) 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;
- 7.9.10 it is important that if a Reporter has elected to remain anonymous, he/she should periodically check the TOA or Deloitte website or phone TOA for an update, as the GEO may have requested additional information to allow it to continue with its investigation; and
- 7.9.11 if no further information, to allow the GEO or OMEs to proceed with its investigation, is received from the Reporter, within two weeks, and the investigation process is unable to continue based on the available information, then the GEO or OMEs may unfortunately have to close the Call Report as not investigated.

8. THE INVESTIGATION PROCESS

- 8.1 Once a Call Report is received by the EthicsLine, it will be forwarded to the GEO for appropriate investigation.
- 8.2 The EthicsLine will provide the Reporter with a unique reference number which must be used when contacting the EthicsLine for any feedback or updates.

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- 8.3 The GEO will assess the Call Report and if it relates to Unethical Conduct, it will allocate such Call for investigation as appropriate.
- 8.4 If the GEO is of the view that the Call Report does not relate to Unethical Conduct as stipulated in clause 6.2 above, it will refer the Call back to TOA or Deloitte and request that the Reporter should be advised that the Call does not fall within the scope of the EthicsLine and as a result it will not be investigated.
- 8.5 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.
- 8.6 Once the Call Report has been investigated, Sasol may, subject to applicable law, provide appropriate feedback via the EthicsLine regarding the outcome of the investigation.
- 8.7 It is possible that the Reporter may not be involved in the investigation, however Sasol takes all Call Reports of Unethical Conduct seriously and Reporters are assured that all Call Reports will be investigated appropriately, without fear or favour, neutrally and without bias for the parties involved.
- 8.8 Anti-retaliation:
- 8.8.1 no Reporter may be subjected to retaliation as a result of having made a Call Report in Good Faith, even if the Call or concerns are proven unfounded during the investigation process. Retaliation of any type against a Reporter who makes a Call in Good Faith will not be tolerated;
- 8.8.2 additionally, no Employee, Worker or Stakeholder shall be adversely affected because such Employee, Worker or Stakeholder refuses to carry out an instruction that would constitute a violation of laws, policies or the Sasol Code of Conduct;
- 8.8.3 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;
- 8.8.4 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;
- 8.8.5 any Reporter or witness who suspects that he/she is 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; and
- 8.8.6 an Employee or Worker who knowingly and intentionally contacts the EthicsLine to raise a misleading or false concern, or to raise a concern without a reasonable belief as to its truth or accuracy, will not be protected in terms of 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 process thereof are bound by strict confidentiality obligations.
- 9.2 At the election of the Reporter, if permitted by applicable law, the Reporter(s) 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 The 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 provide a guarantee to the effect that this will be retained if external legal action flows from the disclosure.

10. QUESTIONS

- 10.1 Any questions in respect of this Policy or its application should be referred to:
 - 10.1.1 the Group Ethics Office;
 - 10.1.2 the relevant OME Sasol Ethics Officer;
 - 10.1.3 employees Line Managers; and
 - 10.1.4 visit the Sasol website.