



Group Policy: Sasol Gifts, Entertainment and Hospitality Policy

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1. INTRODUCTION

- 1.1 The exchange of Gifts, Hospitality and Entertainment is a common practise in business relationships and can be useful in strengthening these relationships, showing respect and appreciation for business partners.
- 1.2 The giving and receiving of Gifts, Entertainment and Hospitality is however regulated by various global laws due to concerns that they may be inappropriate in certain circumstances and perceived as bribery and corruption.
- 1.3 Sasol prohibits the offering, or receipt of any Gifts, Entertainment and/or Hospitality if these can affect or be perceived to affect the outcome of business transactions or if they are not in-line with this Policy.

2. PURPOSE/OBJECTIVE

- 2.1 The purpose of this Policy is to:
 - 2.1.1 reinforce Sasol's commitment to ensuring ethical and trust-based business relationships with all our stakeholders, by establishing a clear and uniform policy related to the acceptance and provision of Gifts, Entertainment and Hospitality (including business meals);
 - 2.1.2 outline the types of Gifts, Entertainment and Hospitality which are inappropriate; and
 - 2.1.3 provide details as to the requirements when receiving or offering Gifts, Entertainment and Hospitality to Public Officials.
- 2.2 Sasol has a zero tolerance approach to unethical or illegal conduct irrespective of how it affects its business and thus Sasol is committed to ensuring that the giving or receiving of Gifts, Entertainment, Hospitality or any other business courtesies are dealt with in a manner that does not create a conflict of interest for its Employees or counterparties, and which will not result in breaches of any global anti-corruption laws. Additional information about conflict of interest can be obtained in the Sasol Conflict of Interest Policy.

3. DEFINITIONS

In this Policy, the following terms shall have the meaning assigned to them below:

- 3.1 **"Approver"** refers to the person who is tasked with assessing the appropriateness of a request for pre-approval of a Gift, Entertainment or Hospitality event made by an Employee, and such person must be an Employee who is at the role category of "Specialisation" or above;
- 3.2 **"Call(s)"** refer(s) to any formal report(s) made about suspected or alleged Unethical Conduct, through any Formal Reporting Channels;
- 3.3 **"Chief Ethics Officer"** refers to the VP responsible for Compliance, Ethics and Governance;

- 3.4 **"Employee(s)"** refer/s to 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) and officer(s);
- 3.5 **"Entertainment"** refers to the provision of meals, such as lunches, breakfast, or dinners;
- 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's internal and external stakeholders,
 - 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 Deloitte Halo system,
 - 3.6.3 certified by The Ethics Institute 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 **"Formal Reporting Channel(s)"** refer(s) to the authorised internal procedure(s) within Sasol whereby Employees, service providers or third parties can make protected disclosures of any alleged Unethical Conduct;
- 3.8 **"GEO"** is the Sasol Group Ethics Office, comprised of the Chief Ethics Officer and team members employed directly in the Sasol Group Ethics Office;
- 3.9 **"Gift(s)"** mean(s) anything of value received from an external party such as, money, vouchers, goods, services, discounts, branded items, loans, favourable terms given to an Employee in his/her personal capacity including any product or service, transportation, use of vehicles or vacation facilities, shares or other securities, home improvements, usually given as mark of friendship or appreciation;
- 3.10 **"Hospitality"** refers to receptions, tickets or invitations to conferences, seminars, entertainment, social or sports events, lodging, accommodation, or travel and is usually an all-inclusive experience including meals or drinks and promotional items, and entertainment and hospitality may be offered together as one event subject to the following:
- 3.10.1 the host being present at the event; and
 - 3.10.2 if the host is not present, entertainment and hospitality is regarded as a gift;
- 3.11 **"OME(s)"**, refer(s) 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;
- 3.12 **"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(s) to support and assist the GEO with *inter alia* managing and investigating Calls allocated to the OME(s);

- 3.13 **"Policy"** refers to this Sasol Gifts, Entertainment and Hospitality Policy as detailed herein and approved in accordance with Sasol's Delegation of Authority document;
- 3.14 **"Politically Exposed Person(s)"** refer(s) to individual(s) who is/are or has/have been entrusted with prominent public function(s), for example head(s) of state or government, senior politician(s), senior Public Official(s), judicial or military official(s), senior executive(s) of state-owned corporation(s), important political party official(s) as well as the close business associate(s) of such individual(s) and family member(s), and family member(s) include(s) the official's spouse, the official's and the spouse's grandparents, parents, siblings, children, and any other individuals who share the same household.
- 3.15 **"Procedure and Guideline"** refers to the Sasol Gifts, Entertainment and Hospitality Procedure and Guideline document detailing the processes and procedures to be followed when declaring and managing the giving and receiving of Gifts, Entertainment and Hospitality;
- 3.16 **"Public Official/s"** refer/s to:
- 3.16.1 an employee(s) or officer(s) of a government entity/ies, state owned entity/ies or department(s), agency/ies or instrumentality thereof;
 - 3.16.2 any person acting in an official capacity for or on behalf of any such government or instrumentality;
 - 3.16.3 any federal, state, regional, county or municipal working person or functionary;
 - 3.16.4 an employee(s) or officer(s) of an organisation authorised by the local government to perform government functions;
 - 3.16.5 personnel of federal, state, regional, county or municipality -owned or -controlled commercial corporations, enterprises, institutions or organisations (whether partially or wholly owned);
 - 3.16.6 outside director(s) of state, regional, county or municipality-owned entity/ies;
 - 3.16.7 legislator(s) (whether full or part-time);
 - 3.16.8 a person holding an honorary or ceremonial government position;
 - 3.16.9 political party official(s), and candidate(s) for political office; and
 - 3.16.10 an officer(s) or employee(s) of public international organisation(s) such the World Bank;
- 3.17 **"Reporter(s)"** refer(s) to stakeholder(s), including Employee(s), service provider(s) or third party/ies who make(s) Call(s) regarding alleged or potential Unethical Conduct to Sasol through the Formal Reporting Channels;
- 3.18 **"Sasol"** means Sasol Limited, its subsidiaries and Sasol operated joint ventures;
- 3.19 **"Sasol Group of Companies"** mean Sasol Limited and all its subsidiaries;

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- 3.20 **"SDS"** means the Sasol Declaration System which is an electronic platform to be used by Employees to declare any conflicts of interest and to seek pre-approval for the receipt or offering of Gifts, Entertainment and Hospitality;
- 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 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, Sasol values, and breaches of laws and/or regulations and this 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, concerns relating to internal accounting controls or auditing concerns, internal business practices that are inconsistent with generally accepted accounting principles, collusion with competitors, human rights abuses/violations/infringements, data protection infringements, improper use of Sasol resources, insider trading, retaliation or victimisation for making a Call; and
- 3.24 **"VP"** refers to a vice president of the relevant OME.

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 the Sasol Group of Companies as a whole, inclusive of all Employees, legal entities and subsidiaries including joint ventures to the extent that Sasol has majority shareholding and/or management control and subject to the acceptance and approval of this Policy by the respective entities' board of directors or other responsible corporate decision-making body. Entities in which Sasol does not have majority shareholding and/or management control are encouraged to apply this Policy or a similar standard.
- 5.2 In any country where this Policy conflicts with regulatory requirements, such local regulatory requirements shall override this Policy to the extent required.
- 5.3 This Policy must be read and understood in conjunction with the Sasol Anti-Bribery Policy, the Sasol Conflict of Interest Policy and the Sasol Code of Conduct.
- 5.4 This Policy is applicable to all Gifts, Entertainment and Hospitality offered to or received from external parties such as Sasol customers, service providers, suppliers, business partners, advisors, Public Officials and any individual or entity that has or seeks a business relationship with Sasol.

- 5.5 Gifts, Entertainment or Hospitality offered by Sasol to its Employees or between Sasol Employees do not fall within the scope of this Policy. However, if such Gifts, Entertainment or Hospitality may result in an actual, perceived, or potential conflict of interest, then the principles set out in the Sasol Conflict of Interest Policy may be applicable.

6. INAPPROPRIATE AND IMPERMISSIBLE GIFTS, ENTERTAINMENT OR HOSPITALITY

- 6.1 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.
- 6.2 Sasol prohibits the offering or receipt of any Gifts, Entertainment or Hospitality, if such Gifts, Entertainment or Hospitality can affect or be perceived to affect the outcome of business transactions or influence a person's objectivity in doing his/her job.
- 6.3 Sasol prohibits the offering of any Gifts, Entertainment or Hospitality if such Gifts, Entertainment or Hospitality are made with the intent of influencing a person or Public Official to, amongst others, retain or obtain any advantage from him/her. Additional requirements applicable to the giving of Gifts, Entertainment or Hospitality to Public Officials are set out in clause 8 below.
- 6.4 Sasol prohibits the accepting or offering of Gifts which are in the form of cash or a cash equivalent such as shares, vouchers, coupons, prepaid or prefunded debit cards, and gift cards.
- 6.5 Sasol prohibits the offering or accepting of Gifts, Entertainment or Hospitality which are above the monetary thresholds set out in clause 7.3 below, unless these have been pre-approved in accordance with the process set out in the Procedure and Guideline document.
- 6.6 The offering or accepting of Gifts, Entertainment or Hospitality while the parties are engaged in a tender or competitive bidding process, pending legal proceedings, or sensitive negotiations, poses an increased risk that the offering of Gifts, Entertainment or Hospitality could be perceived as inappropriate and Employees should try to avoid the offering or receipt of Gifts, Entertainment or Hospitality during this time. If the offering or receipt of Gifts, Entertainment or Hospitality cannot be avoided in these circumstances, the offering or receipt of Gifts, Entertainment or Hospitality must be pre-approved via the SDS.
- 6.7 Sasol Employees who are marketing and selling Sasol products may entertain potential or actual buyers, provided that such Gift, Entertainment and Hospitality is reasonable and consistent with acceptable business practices and this Policy.
- 6.8 Sasol prohibits the offering of any Gifts, Entertainment or Hospitality which may create a perception on the recipient to reciprocate or places the recipient under an obligation, or which are made secretly and not fully documented in accordance with Sasol's processes.
- 6.9 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 or Hospitality for the purpose of this clause.

- 6.10 No family members or close friends may be given Gifts, Entertainment or Hospitality from Sasol suppliers or customers, and no family members or close friends may accept any Gifts, Entertainment or Hospitality from such suppliers or customers. The inappropriateness of Gifts, Entertainment or Hospitality will not change if such Gifts, Entertainment or Hospitality are offered to the partners of Sasol Employees, and an obligation is placed on Employees to disclose any Gifts, Entertainment or Hospitality offered to their partners if the offer is based on the Employees relationship with Sasol suppliers or customers.
- 6.11 Sasol prohibits the offering or accepting of Gifts, Entertainment or Hospitality that are of an indecent nature or are provided at an inappropriate venue.
- 6.12 Sasol prohibits the offering of Gifts, Entertainment or Hospitality, if it is known that this will violate the recipient's policy or codes of conduct, or local regulatory requirements.
- 6.13 Gifts, Entertainment or Hospitality should only be accepted or offered if the intention thereof is to build and strengthen the business relationship with Sasol.
- 6.14 Sasol Employees may not solicit or induce any third parties to provide them or their partners with any Gifts, Entertainment or Hospitality.
- 6.15 If the pre-approval is declined, the Employee may not proceed with the giving or receiving of the Gifts, Entertainment or Hospitality, and the process set out in the Procedure and Guideline related to declining and returning of Gifts, Entertainment or Hospitality must be followed

7. CONSIDERATIONS FOR DETERMINING THE APPROPRIATENESS OF GIFTS, ENTERTAINMENT OR HOSPITALITY

- 7.1 Any Gift, Entertainment or Hospitality offered or received must:
 - 7.1.1 comply with applicable local regulatory requirements and be customary in that region or country;
 - 7.1.2 be limited to expenditures which are reasonable, proportionate, and business related;
 - 7.1.3 be of a value which is below the thresholds set out in clause 7.3 unless pre-approval has been obtained;
 - 7.1.4 be intended to promote the brands, products and services of Sasol or the entity giving it;
 - 7.1.5 be offered in the normal course of business dealings;
 - 7.1.6 neither be of substantial value, nor be offered or received too frequently, and must be in accordance with clause 6.8 above;
 - 7.1.7 be modest in value and appropriate considering the culture and standard of living in the country or region where the Gift, Entertainment or Hospitality is given or received;

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7.1.8 be given openly and transparently to the recipient without the expectation of reciprocity; and

7.1.9 be of a nature that would not harm Sasol's reputation, if publicly disclosed.

7.2 If the cost of the Gift, Entertainment or Hospitality is above the threshold amounts set out in clause 7.3, then Employees must obtain a written pre-approval for the giving or receiving of that Gift, Entertainment or Hospitality. The threshold amount will depend on the geographic region in which the Gift, Entertainment or Hospitality is received. The process to obtain pre-approval is detailed in the Process and Guideline Document.

7.3 The table below provides the details regarding the different thresholds that will apply when the recipient is NOT a Public Official:

	Gifts	Entertainment and/or Hospitality	Reviewer	Approver
The Gift, Entertainment or Hospitality is received in any country in Africa or South America	Greater than US\$30 per person	Greater than US\$100 per person per event	Compliance Officer*	Line manager who must be at least at "Specialisation" role category or GEC3"
Gift, Entertainment or Hospitality is received in any country besides Africa or South America	Greater than US\$50 per person	Greater than US\$150 per person per event	Compliance Officer*	Line manager who must be at least at "Specialisation" role category
If the amount of the Gift, Entertainment or Hospitality is equal to or exceeds these values, regardless of the location where the Gift, Entertainment or Hospitality received	US\$100 per person	US\$300 per person per event	Chief Ethics Officer**	Line manager who must be at least at "Specialisation" role category and GEC1 must be consulted

*Member of the Group Compliance Services

**Member of the Group Ethics Office

7.4 As mentioned above, Entertainment or Hospitality where the host is not present is regarded as a Gift and the thresholds for Gifts must be applied.

7.5 Promotional items of a low value such as branded caps, pens, shirts, mugs, and diaries may be offered or received in reasonable quantities and do not need to be declared or recorded. Items of nominal value, such as taxicab fares, small reasonable meals, and snacks, coffees, and cooldrinks do not need to be declared nor recorded as per clause 7.10 below.

7.6 When offering Hospitality or Entertainment, the business activities should predominate over Entertainment or personal activities and the location of such activities should have a nexus to Sasol (i.e. the location of Sasol plants, offices, logical "half-way" point).

- 7.7 Sasol Employees must attend Hospitality or Entertainment events that they offer to support the business justification or relationship building requirements.
- 7.8 In order to meet the relevant legislative provisions related to the keeping of accurate “books and records” and “internal controls”, each Sasol business must maintain accurate books, accounts, and records, which honestly and accurately, detail transactions including the giving and receiving of Gifts, Entertainment or Hospitality.
- 7.9 Employees cannot split Entertainment or Hospitality costs to stay below the monetary thresholds.
- 7.10 It is thus essential that the details of all Gifts, Entertainment or Hospitality received or offered are recorded transparently and accounted for within the relevant Sasol business. Included in the detailed paper trail must be sufficient details as to the purpose of the Gift, Entertainment or Hospitality, the names of all recipients, the amount and nature of the expenditure and relevant dates. Subject to clause 7.5 above, please note that this requirement is applicable to all Gifts, Entertainment or Hospitality received or offered and it is not limited only to those which require pre-approval.
- 7.11 For Entertainment or Hospitality events which include trips, plant/site tours and similar on-site visits, not only the Gifts, meals and Entertainment provided should be recorded and detailed but also the itinerary of business events and/or meetings associated with the visit must be captured and recorded. This will support the business justification of the event.
- 7.12 When the Approver receives a request for pre-approval of a Gift, Entertainment or Hospitality, he/she must fully apply his/her mind to the request and assess that the request is in accordance with this Policy and Procedure and Guideline document.

8. ADDITIONAL CONSIDERATIONS FOR DETERMINING THE APPROPRIATENESS OF GIFTS, ENTERTAINMENT OR HOSPITALITY GIVEN TO PUBLIC OFFICIALS

- 8.1 Some countries have different and/or stricter rules when dealing with Gifts, Entertainment or Hospitality given to Public Officials. Extra caution must therefore be exercised by all Employees when giving or receiving Gift, Entertainment or Hospitality to or from Public Officials. Please refer to the Sasol Anti-Bribery Policy requirements or seek advice from the OME Ethics Officer or the Centre of Expertise for Governance Laws within Sasol Legal Services if you are unsure about how to proceed.
- 8.2 The written pre-approval must always be obtained from the Approver in the Sasol business that is giving or receiving any Gift, Entertainment or Hospitality to/from a Public Official, regardless of the value of such Gifts, Entertainment or Hospitality. If the person giving or receiving the Gift, Entertainment or Hospitality is at Specialisation role category, then approval must be sought from the next level line manager.
- 8.3 The Centre of Expertise for Governance Laws within Sasol Legal Services must also always be consulted in writing regarding any proposed Gift, Entertainment or Hospitality to or from Public Officials.
- 8.4 The government agency or state-owned entity should be notified of any Gift, Entertainment or Hospitality offered to its representatives.

- 8.5 No Sasol Employee may give, promise, offer or authorise the payment of any hosting expenses, nor the giving of any Gift, Entertainment or Hospitality to a Public Official if that could be viewed as a bribe or otherwise be viewed as influencing the official's decision.
- 8.6 As mentioned in clause 7.10 and 7.11 above, it is essential that detailed and transparent paper trails are maintained regarding all Gift, Entertainment or Hospitality offered to Public Officials.
- 8.7 Sasol must have control over the Entertainment and Hospitality that is provided and must not pay daily allowances (per diems), unless required by law, prevent abuse of drinks "tab", nor reimburse "personal activities" that a Politically Exposed Person decided to participate in whilst on the site visit or business trip.
- 8.8 Entertainment and Hospitality must be provided only to those individuals that have a legitimate business purpose for attending the event unless such an individual is accompanying the Public Official to a Sasol event as a guest and only if Sasol Employees, attending the same event, are authorised to invite their own spouses or partners to such event. Sasol must not pay for or reimburse travel expenses for spouses, family members or other persons who do not have such a legitimate business purpose, unless they are invited and authorised to attend such events.
- 8.9 Any travel or accommodation offered to Public Officials must be consistent with the type of travel and accommodation offered to Sasol Employees operating at a similar level and must be restricted to travel to and from places of business. Sasol may not pay for or reimburse for travel arrangements that include side trips that are of a personal benefit.

9. REPORTING OF VIOLATIONS AND CONSEQUENCES OF NON-COMPLIANCE

- 9.1 Any non-adherence to this Policy may lead to disciplinary action in accordance with Sasol's approved disciplinary processes, which may include dismissal.
- 9.2 Sasol is committed to ensuring that Employees can speak up with confidence if they have any concerns or need to ask for help. If Sasol Employees suspect or observe anything that they think might be in contravention of this Policy, they have an obligation to report it. They should raise their concerns with their line manager, legal advisor or through the Sasol EthicsLine.
- 9.3 When the Approver receives a request for pre-approval of a Gift, Entertainment or Hospitality, he/she must fully apply his/her mind to the request and assess whether the request is in accordance with this Policy and Procedure and Guideline document.
- 9.4 Should a Sasol Employee feel that an attempt is being made by a third party to unfairly influence him/her through the giving or offering of Gifts, Entertainment or Hospitality, such an Employee is required to inform his/her OME Ethics Officer, the GEO or the Centre of Expertise Governance Laws.
- 9.5 Personal data gathered during the pre-approval process will be handled in accordance with applicable privacy and data protection laws, as read with the Sasol Privacy Policy.