

sasol



CODE OF CONDUCT



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"Ethics is knowing the difference between what you have a right to do and what is right to do."

Potter Stewart



1 TOWARDS OUR CULTURE

Message from Fleetwood Grobler

Fleetwood Grobler
President and Chief Executive Officer

At Sasol, we are connected by our Company values and related behaviours. This defines who we are and helps us establish and maintain trusted business relationships across our organisation: on projects, in operations, retail forecourts, distribution warehouses, and our offices globally.

The word ‘behaviour’ is key. We have deliberately shifted away from a Code of Ethics to a Code of Conduct because conduct is about how we act in various of situations and is integral to our values and culture.

Through our actions, we uphold Sasol’s reputation and ensure our long-term success. Respect for human dignity and rights, in particular, are critical for the sustainability of our business. It is how we interact with and represent Sasol to our colleagues, customers, shareholders, suppliers, partners, regulators, governments and communities. We help shape their impression of us, as individuals, and create a positive perception of our Company.

Before we ask, ‘how should we behave?’ we should ask ‘what do we value?’, because our actions are always consequences of what is most important to us. For example:

- If we value our safety, health and environment, we’ll take care of ourselves and each other at work and behave in a way that respects our natural resources.
- If we value our people, we’ll support their growth and development, show respect and promote collective diversity.
- If we act with respect and integrity and ensure legal compliance, we’ll have the courage to walk the talk and speak up when we see an injustice.
- If we value ownership, accountability and delivering what we promise, we’ll take responsibility for our own performance and the performance of our teams.

Our seven values, supported by various Company policies, underpin our Code of Conduct and define our organisation. When we act according to these values, we ensure the sustainability of a business we can all be proud of – one that is successful, ethical, contributes to economies and society, and where integrity and respect are non-negotiable.

Let’s all drive towards our culture together – the right way.

Best regards

Fleetwood Grobler
President and Chief Executive Officer

2 ABOUT SASOL'S CODE OF CONDUCT (THE CODE)

Why is the Code important?

It is a public statement that Sasol is committed to good corporate governance, applying consistent and high standards. It is applicable to all employees, officers and Directors of the Board.

It is underpinned by Sasol policies and does not supersede Sasol policies, procedures and practices.

We encourage employees to read and uphold all applicable policies.

It supports sustainable performance

Sasol chooses to be an ethical business driving sustainable performance. Ethical companies regularly outperform their competitors in the long term. We will never sacrifice our ethical reputation.

It creates loyalty and trust with our stakeholders

Having a good reputation with our stakeholders, including customers, suppliers, partners, investors, regulators, governments and communities ensures our long-term success. Customers support companies they trust. Communities are more open with companies that have a good track record and investors are more confident with organisations that deliver on their promises.

It guides our work and relationships

The Code is the foundation of our behaviour internally and externally. It guides our actions and encourages us to speak up and take action if we see unethical behaviour.

It brings us closer to our culture

The Code is our roadmap to being proudly Sasol, where we pursue excellence, drive innovation and embrace change, work globally and collaboratively, and understand that our diversity is our strength.

Communication of the Code of Conduct (the Code)

It is crucial that as members of the Sasol team we read and understand the Code.

As individuals, we must comply with the Code.

This responsibility cannot be delegated to others.

3 OUR EXPECTATIONS



of our leaders

- Our team leaders and managers promote and drive a clear understanding of the principles of the Code.
- Leaders enforce consequences if a member of our team fails to comply with the Code, up to and including dismissal.
- Leaders ensure there are adequate internal controls in the areas they oversee to ensure we comply with the requirements of applicable laws and adopted, non-binding rules, codes and standards, and manage our risks effectively.



of our business partners

We only do business based on fair, lawful, efficient and transparent practices. This means:

- Our business partners, including joint ventures over which we have management control and where the joint venture agreement allows for the application of the Code, must follow the Code and show integrity in doing business.
- Our service providers and suppliers (referred to jointly as suppliers) must adhere to and apply the Sasol Supplier Code of Conduct, which is based on this Code of Conduct.
- We deliver what we promise to our stakeholders.
- We compete fairly with our competitors.



of each other

- We hold each other accountable to the principles of the Code, encouraging ethical behaviour and the good faith reporting of unethical actions and human rights violations without fear of retaliation or victimisation.
- Remember: we are 'Team Sasol' and one person's actions affect the entire team.
- We promote the spirit of the Code.

4 OUR VALUES



Our seven values

Our Code of Conduct is how we entrench and live Sasol’s values. These values represent the roadmap to the key behaviours set out in the Code, which are summarised below:



We ensure that safety, health and environment is a top priority.

OUR BEHAVIOUR

- I care about my own safety and that of every person I work with.
- I take a stand, speak up and own issues related to safety, health and environment.

CODE PRINCIPLES

- We prioritise safety, health and the environment.
- We ensure a secure workplace.



We care for our people and support their development.

OUR BEHAVIOUR

- I approach any task as an opportunity to collaborate, learn and support the people I work with.
- I celebrate my colleagues’ successes and support their potential to develop further.

CODE PRINCIPLES

- We prevent alcohol, drug and controlled substances abuse in the workplace.
- We provide support through our employee wellness initiatives and ICAS to our employees, in many jurisdictions, to deal with their wellbeing.
- We root out harassment, victimisation, retaliation and bullying.
- We invest in our people.
- We apply labour and employment practices that are in line with local legal requirements and the core conventions of the International Labour Organization.



We value and promote diversity and inclusion.

OUR BEHAVIOUR

- I know that my success is strengthened by the people I work with.
- I make a point of seeking out and listening to my colleagues’ views, no matter who they are or where they come from.
- I am aware of my own biases and challenge them constantly.

CODE PRINCIPLES

- We promote diversity and inclusion across our organisation.
- We drive employment equity.



We act with respect and integrity at all times.

OUR BEHAVIOUR

- I have the courage to do the right thing. I speak up.
- I consider others as equals and treat them the way I would like to be treated.

CODE PRINCIPLES

- We respect, uphold and protect human rights.
- We actively manage conflicts of interest.
- We offer and accept reasonable gifts, entertainment and hospitality.
- We consider the appropriateness of providing donations and sponsorships.
- We assess the suitability of accepting external directorships.
- We manage our social media accounts responsibly and with sound judgment.



We comply with all applicable legal requirements.

OUR BEHAVIOUR

- I am alert and responsive to all legal and compliance matters related to my work and take action when I see any non-compliance.

CODE PRINCIPLES

- We do not engage in bribery, corruption, fraud or money laundering.
- We compete fairly and avoid competition law violations.
- We commit to processing personal information lawfully and protecting the privacy of all our stakeholders.
- We do not engage or support any terrorist activities.
- We adhere to trade controls and international sanctions.
- We prevent and refrain from insider trading.
- We ensure compliance with the requirements of applicable laws and adopted non-binding rules, codes and standards.



We take ownership and accountability for our individual and team performance.

OUR BEHAVIOUR

- I embrace a positive attitude and strive for excellence in meeting my own, as well as the performance targets of my team.
- I have the courage to own and acknowledge my mistakes in order to learn from them.

CODE PRINCIPLES

- We protect Sasol's assets and intellectual property.
- We ensure data and information accuracy.
- We fully cooperate with legitimate requests for information in line with regulatory requirements governing access to information and the relevant Sasol policies.
- We promote cybersecurity.
- We keep accurate records and retain, protect and dispose of business records in accordance with regulatory requirements and Sasol's Document Retention Policy.



We deliver what we promise to our customers, shareholders and other stakeholders.

OUR BEHAVIOUR

- I go beyond what is expected to ensure customers and other stakeholders are satisfied.

CODE PRINCIPLES

- We ensure quality customer service and products.
- We disclose information accurately and in a timely fashion.
- We positively engage our communities.
- We work openly with governments and refrain from directly funding political parties.



5

SAFETY, HEALTH AND ENVIRONMENT



We prioritise safety, health and environment (SHE)

To achieve **ZERO HARM**, we prioritise our own safety and that of our colleagues.

We provide safe and healthy working conditions at our workplaces for all our employees and suppliers.

We contribute to the safety of the workplace by being alert and aware of the rules, policies and procedures, as well as reporting any unsafe conditions.

We protect the environment and manage our environmental footprint by running sustainable operations, setting improvement targets and objectives, and adhering to environmental regulatory requirements.

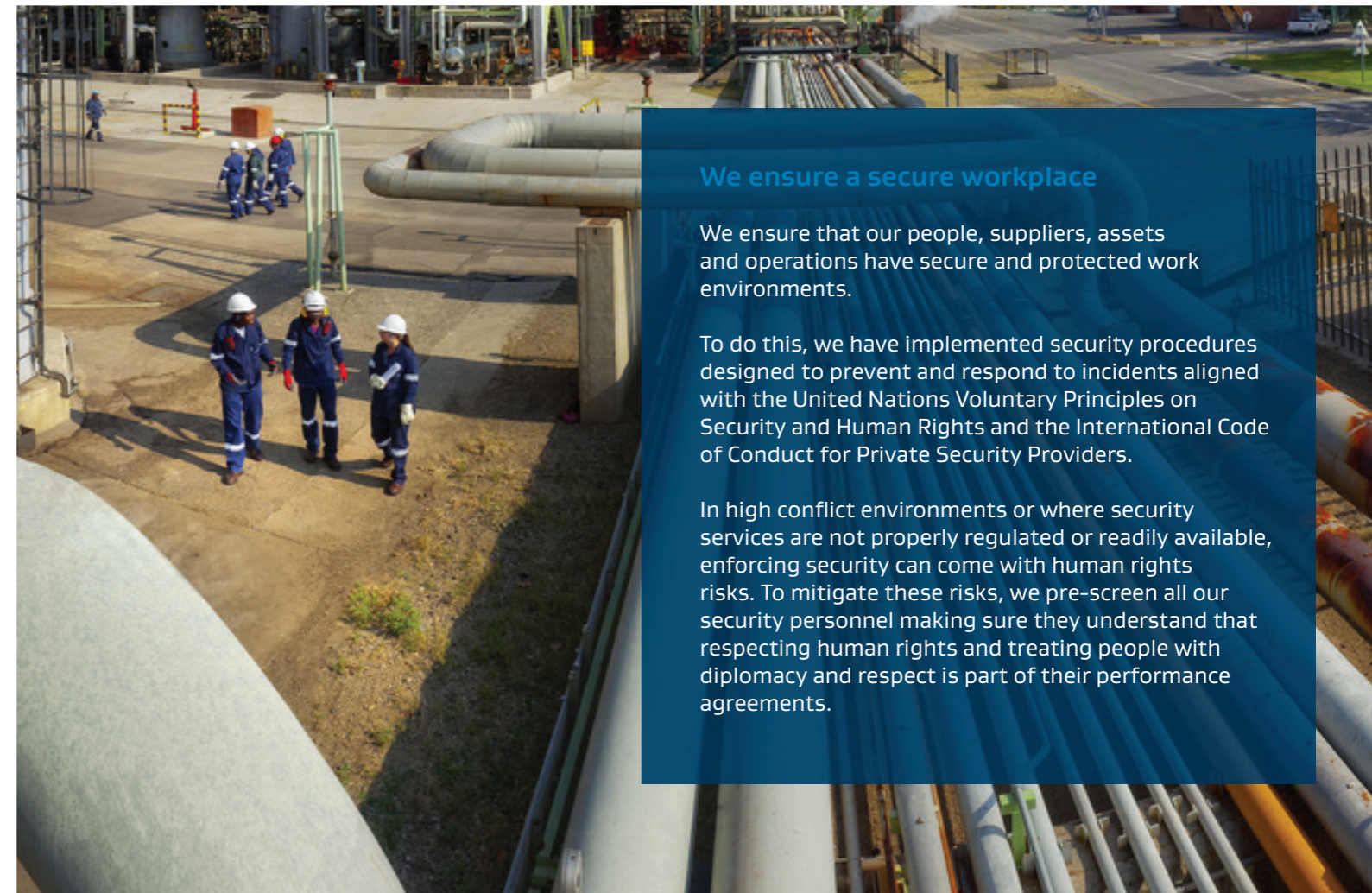
In practice, this means we:

 <p>understand and apply Sasol's SHE and Security Policy and associated procedures</p>	 <p>manage SHE risks in all that we do</p>
 <p>investigate and learn from all SHE incidents</p>	 <p>communicate any precautions regarding the handling our products to our colleagues, customers and anyone who might be affected</p>

Wherever we operate we also respect the natural environment and understand the impact of our business. In all our decisions we aim to balance economic, social and environmental needs and use natural resources responsibly.

Key messages

-  We recognise that we have a responsibility to respect and care for the safety and health of our people, the environment and communities where we operate.
-  We are committed to continuous improvement on our journey in achieving our goal of zero harm.
-  We believe that our goal is achievable through committed leadership, engaged people, teamwork and dedicated focus.
-  We aim to deliver superior value for our stakeholders through an appropriate and well-reasoned balance of economic, social and environmental needs.



We ensure a secure workplace

We ensure that our people, suppliers, assets and operations have secure and protected work environments.

To do this, we have implemented security procedures designed to prevent and respond to incidents aligned with the United Nations Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Providers.

In high conflict environments or where security services are not properly regulated or readily available, enforcing security can come with human rights risks. To mitigate these risks, we pre-screen all our security personnel making sure they understand that respecting human rights and treating people with diplomacy and respect is part of their performance agreements.

6

OUR PEOPLE



We prevent alcohol, drugs and other controlled substances from impairing our interactions and performance.

Alcohol, drugs and other controlled substances impair our ability to interact with those around us and to do our jobs.

Besides affecting our job performance and productivity, the nature of our work means this could have life-threatening consequences, not only for us but also for those who work with us.


We ensure that anyone who is impaired by alcohol or drugs does not enter Sasol's premises, conducts Sasol's business, operates Sasol's vehicles or equipment nor operates non-Sasol vehicles while conducting any activity or business for Sasol. No one can distribute, manufacture, possess/use drugs or alcohol in an unlawful or unauthorised manner in any way connected to Sasol.

We may test any person who wants access to our workplaces for intoxication. If they refuse to be tested, or if we discover they are intoxicated, we reserve the right to deny them entry.

We root out harassment and bullying

We do not tolerate harassment or bullying. Behaviour is abusive when it creates a humiliating, hostile or offensive work environment.

Examples of harassment and abusive behaviour:

 intimidation	 threatening language or gestures
 actual or threatened physical violence	 sexually or racially abusive comments or materials whether in print, electronic or any other form
 humiliation, bullying or mobbing	 false accusation







 verbal or physical abuse or any threats of abuse	 unreasonably interfering with someone's work performance
 sexual harassment, including demeaning jokes, language, gestures and unwelcome sexual advances	We expect individuals to speak up in order to root out this type of behaviour

We invest in our people

We develop, empower and retain values-driven, high-performing employees with the right skills and experience by:

- Investing in skills development.
- Providing appropriate remuneration to attract, retain and motivate the right quality of employees.
- Developing and training existing talent.
- Maintaining positive employee relations through regular review and updates to our employee relations policies.
- Applying labour and employment practices that are in line with local legal requirements and the core conventions of the International Labour Organization.

 **Key messages**

-  We prioritise safety and security.
-  We never arrive at or perform our work intoxicated, whether from alcohol, drugs, controlled substances or anything else that impairs our judgment.
-  We never harass or bully anyone at work. This includes verbal and physical abuse, sexually and racially abusive comments, sexual harassment, and interfering with someone's ability to do their job.
-  We invest in our people through training, appropriate remuneration and regular reviews.
-  We apply discipline fairly and consistently through observing rules of natural justice.
-  We speak up without fear of retaliation or victimisation when we witness violations of the Code.






DIVERSITY AND INCLUSION



We promote diversity across our organisation

Our people come from different backgrounds and all of us offer unique skills, insights and experiences to Sasol. Our diversity is our strength and we are better as a team because of it.

We never discriminate based on:

 race, ethnicity, religion or culture	 language or nationality
 age, gender or sexual orientation	 political opinion or trade union membership
 health status and disabilities	

We drive employment equity

Equal opportunity

We promote equal opportunity employment throughout our organisation, taking into account local regulatory requirements.

In South Africa, because we believe in compensating for past injustices, we may where justified, offer a hiring or development advantage to certain groups of people based on their race, ethnicity, gender or disability.

Our leaders, managers and supervisors identify and resolve any employment equity concerns quickly. As employees, we maintain quality relationships with our colleagues, seeking to resolve any disagreement amicably and swiftly.







Pay and performance

Some of our people are paid differently because they have more accountability in their roles, or because they offer scarce skills and expertise.

This is not discrimination but the way free markets work and how we attract top talent in our industry.

Key messages

-  Our diversity is our strength. We perform better as a team because of it.
-  We never discriminate based on race, ethnicity, religion, culture, language, nationality, age, gender, sexual orientation, political opinion, trade union membership, health status or disabilities.
-  We drive employment equity and address racial, gender and disability imbalances.
-  We uphold freedom of association and the right to collective bargaining.

INTEGRITY AND RESPECT










We respect human rights

We recognise 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 our business.

We respect, uphold and protect human rights, and conduct business based on fair, lawful, efficient and transparent practices. Our approach is premised on compliance with applicable legal requirements including on child labour and the abolishment of modern slavery and human trafficking in all the jurisdictions in which we conduct our business. Our compliance programme in all the jurisdictions in which we operate is a key enabler in this regard. We have a Business and Human Rights Framework to ensure that Sasol's human rights performance is optimally aligned with the United Nations Guiding Principles on Business and Human Rights in the near-term. Our performance is disclosed in a transparent manner in our suite of annual reports .

Due to the nature, location and scale of our work, our commitment to human rights is enabled by our business activities and practices through which we :

 <p>respect diversity, ensure equal opportunities and eradicate discriminatory practices</p>	 <p>uphold freedom of association and the right to collective bargaining</p>
 <p>maintain safe, secure and healthy working environments and occupational conditions that do not infringe on human rights</p>	 <p>provide conditions of employment, remuneration, wages and benefits that are fair and competitive</p>
 <p>respect the rights of fenceline communities and all indigenous people that may be affected or impacted by our business activities, including land tenure and access to water rights</p>	 <p>manage human rights impacts in our supply chain within our sphere of influence</p>
 <p>responsibly manage our environmental footprint</p>	

Our commitments are informed by the International Bill of Rights, applicable United Nations compacts, guiding principles and internationally accepted codes of conduct and performance standards. These commitments and associated practices are outlined in our Human Rights Policy, supported by our Safety, Health and Environmental (SHE) Policy, Security Policy, Supply Chain Policy, Whistle Blower Policy, Anti Bribery Policy and Supplier Code of Conduct among others. We identify and mitigate human rights risks in accordance with our Enterprise Risk Management process, framework and Policy. We engage and collaborate with our stakeholders and solicit feedback to enhance our performance on human rights and social value creation. We expect our joint venture and business partners, as well as suppliers, to uphold our Human Rights Policy and encourage them to implement similar policies within their own businesses. Suppliers are required to comply with the Policy through our Supplier Code of Conduct. We provide grievance mechanisms and ensure that human rights concerns and complaints are appropriately investigated and reported on.

We actively manage conflicts of interest

We actively manage actual, potential or perceived conflicts of interest.

Decisions like who to hire or how much to pay them must be made in Sasol's best interests. If an employee could be influenced by private interests when doing their job, this must be declared immediately.

What does a conflict of interest look like?

Here are some examples:

- Utilising Sasol information or time for a job outside of Sasol.
- Working for or advising a competitor of Sasol.
- Holding private work outside of Sasol which could impact work performance at Sasol.
- Having a personal relationship such as a family relationship, a business/commercial/financial relationship, a romantic/sexual relationship with another Sasol employee who can influence salary, performance review or promotion.
- Having a personal relationship with a competitor of Sasol which could impact the objectivity of decisions within work environment at Sasol.

We exercise sound judgment when offering and accepting gifts, entertainment and hospitality

We only accept and give gifts, entertainment and hospitality of a reasonable value. Gifts, entertainment and hospitality could be viewed as a way to gain or give an unfair business advantage. They should never influence a person's objectivity in doing their job, whether it is a supplier, customer, business partner or a superior.

Unreasonable influence vs building relationships

Exchanging gifts or taking a client out for dinner can be a great way to build business relationships. There is nothing inherently unethical about these kinds of exchanges, but if the offering of the benefit creates a conflict of interest in the mind of the recipient it could be perceived to be inappropriate.

Some gifts, entertainment and hospitality can exert an improper influence if they are, or can be perceived to be, undue attempts to sway decisions or behaviour.

To avoid these kinds of situations, we:

- Avoid expectations of reciprocity.
- Never receive gifts, entertainment, travel benefits or hospitality from people (including their partners, family members or close friends) engaged in a tender, competitive bidding, commercial negotiation or selling process.
- Never accept or give cash or cash equivalents like shares, vouchers and gift cards.
- Avoid the offering of gifts, entertainment, travel benefits or hospitality to public officials unless it is lawful, reasonable and directly related to plant visits or Sasol business activities.
- Declare and seek pre-approval for all gifts, entertainment and hospitality that we offer or receive that could be perceived to create a conflict of interest or which are worth more than the threshold amounts contained in the current Gift Entertainment and Hospitality Policy.

We monitor the appropriateness of providing donations and sponsorships


Donations and sponsorships carry the risk of diversion, which is when the donation actually benefits someone other than the charity or organisation it is given to, for example, when a donation is made in exchange for a business favour. To prevent this, Sasol implements appropriate controls to monitor the proper utilisation of donations and sponsorships. We will not use donations or sponsorships to inappropriately sway decisions or behaviour.

If we want to sponsor or contribute to a charity as part of our Sasol accountabilities, we first get approval from Group Corporate Affairs or the relevant Executive Vice President (EVP).

We assess the suitability of accepting external directorships

We acknowledge that there is nothing inherently unethical if an employee holds an external directorship.

However, some directorships can create a perception of a conflict of interest and a risk of non-compliance with competition law. This can negatively affect Sasol's reputation and may even constitute an offence.



To protect our reputation:

We generally limit external directorships and only allow external directorships as provided for in the Group's External Directorship Policy.

We consider external directorships carefully and prohibit our people from holding directorships in our competitors, potential competitors or companies we do business with or donate to.

We manage our social media profile

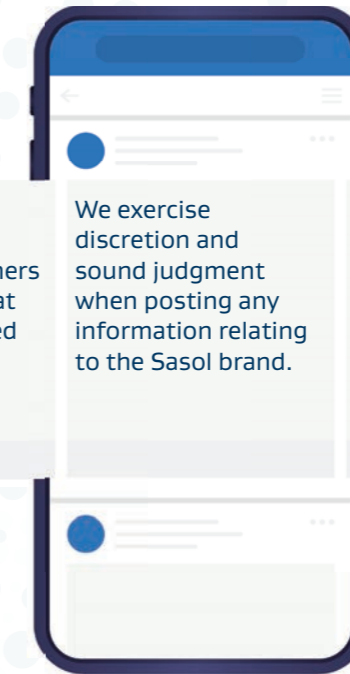
We do not engage in any conduct that could be considered unacceptable in Sasol's workplace.

We show proper consideration for the privacy of others and for topics that may be considered objectionable or inflammatory.

We exercise discretion and sound judgment when posting any information relating to the Sasol brand.

We are personally responsible for all content that we publish (including 'shares' and retweets) on all social media channels.

We are encouraged to use appropriate internal channels or the EthicsLine rather than social media channels to raise personnel or workplace matters.



Key messages

- We protect human rights, including through identification and mitigation of human rights risks, free association and fair labour practices that prohibit forced or child labour and modern slavery; implementation of grievance mechanisms to enable the investigation and remedy related incidents.
- We manage conflicts of interest, ensuring that our employees do their jobs objectively. If there is an actual, potential or perceived conflict of interest, we declare it immediately.
- We avoid accepting or giving gifts, travel benefits, hospitality, entertainment, donations and sponsorships that could be seen as a way to improperly influence decisions and behaviour.
- We consider external directorships carefully, limiting external directorships to one per employee when remunerated and/or Sasol's resources and/or time are required. We prohibit our people from being a director at an existing or potential competitor's business and organisations we do business with or make donations to.
- We use Sasol's electronic communication tools which are authorised for business use by Sasol users (email, Microsoft Teams, instant messaging, SMS, MMS, access to internet and social media) in line with Sasol's eCommunication Policy.
- We handle ourselves appropriately on social media, with proper consideration for the privacy of others and for topics that may be considered objectionable or inflammatory.





LEGAL AND COMPLIANCE RISK







We commit to processing personal information lawfully and protecting the privacy of all our stakeholders

We respect everyone’s fundamental right to privacy

To make this happen, we:

 <p>treat personal information in accordance with the Sasol Privacy Principles</p>	 <p>store personal information securely for a defined period and in accordance with applicable legislation</p>
 <p>give access only to the people who legitimately require personal information and respect internal information access governance policies and procedures</p>	 <p>treat personal information with the highest levels of confidentiality</p>

Key messages

-  We process all personal information in line with applicable data privacy legal and compliance requirements.
-  We adopt appropriate security measures to protect the confidentiality, integrity and availability of all personal information.
-  We minimise the amount of personal information we process, to what is strictly necessary to achieve our purpose.
-  We respect privacy by storing personal information securely and handling it in accordance with the Sasol Privacy Principles.

We guard against bribery, corruption, fraud, money laundering and terrorism

We oppose corruption and dishonesty in any form.

We will not ask for or accept, any bribes, directly or indirectly. This applies to our employees, partners, suppliers, customers, regulators and shareholders.

No one connected to Sasol should be influenced or try to influence another person, company or government agency unlawfully. We are honest with our customers, suppliers, partners, regulators and shareholders. We would rather lose business or miss an opportunity, than obtain or retain it dishonestly or illegally.

Dishonesty includes:

- Bribery and corruption – this includes offering, giving, promising, requesting, agreeing to receive or accepting a benefit from anyone with the intention of receiving an unfair advantage, even via a third-party. We will not use our positions within Sasol to obtain undue benefits from external parties, for example employment for family members.
- Money laundering – trying to hide an unlawful source and direction (including supporting terrorism) of monies, as well as withholding an interest in such activities.
- Accepting or offering facilitation payments – these include payments meant to speed up routine things like releasing goods from customs.
- Intentionally lying or distorting the truth – this includes not doing the things we should, such as allowing a false perception to continue while knowing the truth.

We never ask for, offer, give or accept bribes, directly or indirectly. We will never pay facilitation payments. This applies to our employees, partners, suppliers, customers, regulators and shareholders. If you notice any suspicious activity, report it to Sasol Forensic Services or the Sasol EthicsLine.

Payments made under duress (extortion)

Safety is Sasol’s primary concern and we understand that there may be circumstances in which we have no alternative but to make an inappropriate payment in order to protect ourselves or others against loss of life, limb or liberty. Any request for such payment or actual payment made under duress, should be disclosed on the Sasol Declaration System, or the Operating Model Entity’s (OME’s) gift register, and to the OME’s legal advisor as soon as possible, including sufficient details regarding the circumstances surrounding the payment and providing evidence why you felt your life or liberty was threatened.

We ensure ongoing compliance with applicable regulatory requirements

We identify key legal and regulatory risks in jurisdictions in which OMEs conduct business, following a risk-based approach.

We compete fairly and avoid competition law violations

We compete fairly and comply with competition law regulatory requirements.

Competition law regulatory requirements promote or seek to maintain market competition by regulating anti-competitive conduct by companies.

We compete on the merits of our products and services, the prices we charge and the customer loyalty we earn, but never in an anti-competitive way. We treat our customers fairly and we do not share competitively sensitive information with competitors.

Some examples of anti-competitive practices

 <p>cartel conduct between competitors. This includes price fixing, market allocation, collusive tendering (bid rigging) and output restrictions</p>	 <p>anti-competitive agreements between Sasol and its customers/suppliers</p>
 <p>abuse of a dominant market position</p>	 <p>exchange of competitively sensitive information with competitors</p>

How we avoid anti-competitive behaviour

We understand the specific competition law regulatory requirements of the country or region where we operate, including new markets.

We do not share competitively sensitive information with a competitor. This includes information relating to, among others, recent, current or future prices, pricing methods, policies, markets, marketing strategies, territories, customers or suppliers. If for any reason, Sasol is required to disclose competitively sensitive information, we first seek guidance from Legal, Intellectual Property and Regulatory Services.

We abide by Sasol’s Competition Law and Anti-Trust Policy and we ensure that we understand competition law regulatory requirements and the risk of non-compliance.

We adhere to trade controls and international sanctions

We are honest and responsible in our imports and exports and comply with applicable international regulations whenever we buy, produce or transfer our products/services across borders.

We could face serious penalties if we breach trade restrictions and export controls.

If we receive a trade request from a country or business to which trade restrictions apply, we should consult Sasol’s Legal, Intellectual Property and Regulatory Services before we do anything.

We do not engage or support any terrorist activities. We conduct due diligence on customers, suppliers and partners.

We only provide our products or services to individuals, entities, customers or countries that are subject to certain sanctions and located in geographic locations that are subject to certain sanctions if we can ensure compliance with applicable sanction laws.

We prevent insider trading

Insider trading is when an investor uses Sasol’s confidential inside information for personal benefit like trading shares or securities, whether directly or indirectly.







We keep inside information, like our financials and future plans, confidential unless there is a business reason for sharing or if required by regulatory requirements.

We adhere to tax laws and regulations

Sasol commits to act responsibly and strives to arrange its tax affairs in an efficient manner. We always fulfil our compliance and disclosure obligations in accordance with all the relevant regulatory requirements in all jurisdictions where we operate.

Sasol strives to maintain a cooperative relationship with Tax Authorities and to conduct all such dealings in an open, transparent and constructive manner.

 **Key messages**

-  We have zero tolerance for bribery and corruption among our employees, partners, suppliers, customers, regulators and shareholders.
-  We guard against even the perception of bribery and corruption.
-  We compete with our competitors fairly, avoid competition law violations – even the perception of such a violation.
-  We ensure that we understand the specific competition law regulatory requirements of the countries where we operate.
-  We follow and respect trade controls and international sanctions.
-  We prevent insider trading.





OWNERSHIP AND ACCOUNTABILITY



We protect Sasol's assets

We use Sasol's assets and resources to deliver returns for our shareholders and never for personal gain.

This includes:

-  tangible assets like equipment and Information Technology (IT) hardware
-  intangible assets like working time that Sasol pays for or Sasol's collected information on suppliers, customers, partners and competitors

We ensure data and information accuracy

We keep accurate records and retain, protect and dispose of business records in accordance with legal requirements and Sasol's Document Retention Policy.

We cooperate fully with legitimate requests for information. We provide truthful and complete information.

Data and information accuracy extends to our:

- Product claims – we ensure our product claims are truthful, whether it is about safety, quality, performance expectation, limitation or environmental impact.
- Financial information – we keep accurate and complete financial and accounting records.
- Non-financial information – for example, reports on safety, health and environmental impact.

We promote cybersecurity

If Sasol supplies a device for business reasons it may be monitored because the security of our IT systems are essential to running our business. We guard our login details to prevent unauthorised access to our systems.

We protect Sasol's intellectual property





We respect and protect Sasol's intellectual property and confidential information. We never disclose this information unless there's a legitimate reason and we do it in line with our Group Disclosure Control Policy.

Our intellectual property includes:

-  our technology
-  our inventions and patents
-  our business and operational expertise
-  our technical and operational information

Remember: any information about Sasol that is not publicly available is confidential. This includes our operations, joint ventures and supplier, customer and employee information. If unsure of what constitutes intellectual property or how to deal with it, consult Line Manager or Legal, Intellectual Property and Regulatory Services.

 **Key messages**

-  We protect Sasol's assets.
-  We are honest with our stakeholders, regarding our product claims, financial information and reports on various aspects of the business.
-  We are all responsible for keeping Sasol's technology network secure by guarding our access details.
-  We never disclose Sasol's intellectual property, which includes our technology, inventions, patents, business, technical and operational expertise.

OUR CUSTOMERS, SUPPLIERS, SHAREHOLDERS AND OTHER STAKEHOLDERS



We maintain ethical and mutually beneficial supplier relationships

The way our suppliers (including their sub-contractors) act affects Sasol, which is why we only engage in business with companies that show integrity and adhere to our Supplier Code of Conduct and values.

Our Supply Chain Policy and Supply Chain Governance Framework provide clear direction on our expectation from suppliers, our ethical behaviour and fair business practice in all dealings with suppliers.

Our expectation of suppliers

 <p>uphold fundamental human rights and fair labour practices</p>	 <p>act ethically and comply with all applicable regulatory requirements</p>
 <p>proactively manage safety, health and environmental risks</p>	 <p>comply with agreed commercial commitments</p>

Our supply chain principles:

- We are passionate about achieving supply chain excellence for the benefit of Sasol and our stakeholders.
- We enable our operations and customers through the reliable supply of goods, services and products.
- We establish and maintain ethical and mutually beneficial relationships with all stakeholders.
- We optimise the sustainable execution of our supply chain practices through integrated business processes and systems, and an ongoing process of improvement.
- We implement sound management practices to ensure fit-for-purpose supply chain oversight and control.
- We empower, enable, develop and recognise our employees to deliver on our supply chain objectives.
- We manage and respond to supply chain safety, health and environmental risks, and actively minimise our impact on the environment and the communities where we operate.
- We develop regional and local suppliers and pursue local procurement to create shared value.

We ensure quality customer service and products

We deliver what we promise to our customers and do our best to keep our commitments through:

world-class service	optimal product performance	competitively priced products and support systems
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Our product stewardship approach seeks to ensure that our procurement of chemicals and raw materials does not support conflict, follows all regulatory requirements and as far as possible, limits the impact on human health and environment.

We will not sell or manufacture a product if we cannot reasonably be sure it is safe for people and the environment. We also make sure our product claims are truthful.

We are always striving to improve our products, services, technology and procedures to deliver quality, safety and innovation.

We only promise what we can deliver and will never under-quote to obtain a customer's business or lock them in non-market-related and unsustainable contracts.

We drive accurate and timely disclosures

We comply with the regulatory requirements governing fair and timely disclosure of information about our business.

We communicate honestly, accurately and fully in our reports.

We keep affected stakeholders informed by publicly releasing relevant and understandable information.

We don't show any preference or favouritism to any group of shareholders or potential investors.

We respond to legitimate public enquiries professionally and honestly.



We positively engage our stakeholders

We respect the rights, customs and cultures of the fenceline communities and indigenous people we work or interact with.

That means we:

 <p>minimise negative effects on local communities as informed by due diligences or impact assessments</p>	 <p>acknowledge land rights and avoid involuntary resettlements through our project designs</p>
 <p>adopt flexible ways of doing business in line with the Code</p>	 <p>balance cultural heritage, community expectations and economic development</p>
 <p>contribute to the stability and prosperity of communities through various social initiatives</p>	

If we have to resettle a community, we follow internationally accepted performance standards of the International Finance Corporation, the United Nations and voluntary guidelines on land tenure rights and any other laws that apply to the country we are working in.

We work openly with governments and assess political contributions and activities

When working with governments, we act in line with the Code, knowing that our behaviour can affect our reputation and global operations. Some countries have strict limitation on the gifts, training, accommodation and travel expenses that can be accepted by their public officials and Sasol takes these into account.

Gifts other than modest gifts to public officials can only be offered in exceptional circumstances and must be approved by the Sasol Centre of Expertise for Governance and a Vice President or in instances where the gift is offered by a Vice President or Senior Vice President, it must be approved by the Centre of Expertise for Governance and an Executive Vice President.








Practically, this means:

- being constructive, open and cooperative;
- never offering benefits to public officials, where such benefits could be perceived to influence decisions or behaviour;
- avoiding party politics in any country; and
- refraining from accepting a position of leadership in any political party.

A payment to a political figure or party can be interpreted as asking for future favours or interfering in a democratic process and Sasol will therefore not make any payments to political parties or political party officials.

If we make donations or get involved in political activities, we do it as private citizens and make it clear that we do not represent Sasol in doing so.

Key messages

-  We only do business with companies that share our values and act with integrity. Our suppliers must follow our Supplier Code of Conduct.
-  We ensure a fair tender process for our business and have transparent procurement processes in place to ensure this.
-  We ensure that our products and services are world-class.
-  We will never sell a product if we cannot reasonably be sure it is safe to use and does not harm the environment.
-  We disclose public information about our business in an accurate and timely way, without showing favouritism to anyone.
-  We engage with local communities with respect and do business in a way that balances culture, heritage, community expectations and economic development.
-  We are constructive and cooperative with governments, avoiding party politics and as a company, will never pay public officials or political parties.

12 NON-COMPLIANCE

Non-compliance with the Code

Non-compliance with Our Code of Conduct (the Code) and Policies will be considered to be a breach. It may also amount to a contravention of the regulatory requirements in your jurisdiction. Any employee who is found to have contravened the Code will face disciplinary measures, including possible dismissal.

All suspected incidents of contraventions of the Code or Sasol Policies should be reported by following the relevant internal reporting mechanisms or by contacting the Sasol EthicsLine.

Reports can be made in different languages, including English, Afrikaans, Zulu, Sotho, Xhosa, Pedi, Tsonga, Venda, Tswana, SiSwati, Ndebele, Mandarin, Portuguese, Italian and German. If you make a report, you can elect to remain anonymous.

Sasol strictly prohibits any form of retaliation, intimidation, harassment or victimisation against a reporter who, in good faith, makes a report or raises a concern that he or she reasonably believes to be a violation of the Code of Conduct. Retaliation against employees is prohibited even if the reports or concerns are proven unfounded by an investigation.

Any person who has made a report or any witness who suspects that they are being victimised or retaliated against as a result of submitting an ethics report, or for assisting in an investigation, should immediately log another ethics report providing all the details of the alleged victimisation or retaliation.

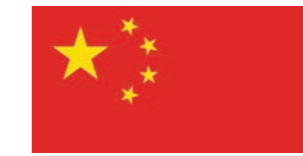
All parties involved with ethics reports and the investigation thereof are bound by strict confidentiality obligations.

Sasol EthicsLine contact numbers

You can contact the Sasol EthicsLine by calling any of the following numbers:



Canada:
1855 421 8968



China:
400 120 3284



Germany:
0800 183 0965



Italy:
800 974 741



Mozambique:
800 112 233
(toll-free when using TDM network) /
800 333 312 toll-free when using Vodacom network)



Singapore:
1800 216 3302



South Africa:
0800 016 017
(toll-free)



United States:
1800 489 1727



United Kingdom:
0800 032 4498

You can also submit a report in writing using the following:



Email: sasol@ethics-line.com



Website: www.sasolethics.com

www.sasol.com

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