

Company Name Sasol
Industry Extractives
UNGP Core Score (*) 8.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
8.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The company's Code of Conduct includes statements that it will 'respect, protect and enhance human rights' as a 'core principle'. It maintains a 'Nomination, Governance, Social and Ethics Committee' that monitors the company's activities 'having regard to relevant legislation, human rights and prevailing best practice', according to its 2017 integrated report. The company's Supplier Code of Ethics also states the company is 'firmly committed to the principles on human rights'. And an 'unabridged' Code of Ethics from 2015 (available online) also notes: 'Amongst others, we subscribe to and endorse the United Nations (UN) Global Compact and UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization's declaration on Fundamental Principles and Rights at Work.' [Sasol Code of Conduct (MS_20): sasol.com] • Met: UNGC principles 1 & 2: The Company is a signatory of the UN Global Compact [UN Global Compact, N/A: unglobalcompact.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company's new code of conduct does not contain commitment to UNGPs • Not met: OECD: The company appears not to have committed to the OECD Guidelines, but states in its Code of Conduct that: 'If we are operating in an area of conflict, or, with a poor human rights track record or weak corporate governance principles, we strive to follow the OECD Guidelines for Multinational Enterprises'. [Sasol Code of Conduct (MS_20): sasol.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The company's code of conduct states that it is 'applying labour and employment practices that are in line with local legal requirements and the core conventions of the International Labour Organisation'. It commits explicitly will ILO core areas [Sasol Code of Conduct (MS_20): sasol.com] • Met: UNGC principles 3-6: The Company is a signatory of the UN Global Compact. [UN Global Compact, N/A: unglobalcompact.org] • Met: Explicitly list All four ILO apply to EX BPs: The Company states that 'Suppliers must not participate in, or benefit from, any form of forced labour – which is work performed involuntarily under threat of penalty. Forced labour includes bonded labour, debt bondage, forced prison labour, slavery, servitude or human trafficking. Suppliers must work to eradicate child labour and must not allow the employment or use of such labour at any of their business centres, when it does not comply with agreements and recommendations of the International Labour Organisation regarding the worst forms of child labour. [...] Suppliers are expected to judge their employees based upon their ability to do their jobs and not upon their physical and/or personal characteristics or beliefs, affirming the principle of no unlawful discrimination based on political opinion, trade union membership, age, language, nationality, ethnicity, culture, race, gender, religion, disability, marital status, sexual orientation, health status and disabilities and so forth [...] Our Suppliers must maintain their employees' right to trade union and collective bargaining, respecting their freedom to join trade unions and the right to bargain collectively. The Supplier must comply with the local laws and regulations governing the legal rights of their workers to join or not join worker organizations including trade unions, and the right to bargain collectively. Where local law prohibits the right to unionize and bargain collectively, or where only state-controlled organizations are allowed, the Supplier should ensure that other forms of worker meetings and representation are allowed.' [Supplier Code of Conduct, 2018: integratedreport.sasol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Explicit commitment to All four ILO Core: The company's code of conduct states that it is 'applying labour and employment practices that are in line with local legal requirements and the core conventions of the International Labour Organisation'. It further states: 'We respect human rights, which include: respecting diversity, free association, and the right to collective bargaining; we ensure that we don't practice forced or child labour; offering fair and competitive wages and benefits; respecting local community rights.' [Sasol Code of Conduct (MS_20): sasol.com] Met: Respect H&S of workers: As above; further the company's code of conduct says the company views safety, health and the environment (given the acronym SHE) as a 'priority' and states: 'We provide safe and healthy working conditions at our workplaces for all our employees and service providers'. [Sasol Code of Conduct (MS_20): sasol.com] Met: H&S applies to EX BPs: The Company states that 'The Supplier is expected to place the necessary emphasis on safety, health and environment. It must provide safe and healthy working conditions for workers' [Supplier Code of Conduct, 2018: integratedreport.sasol.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Regular stakeholder engagement: The Company has engaged with stakeholders including communities who are impacted by their activities. The Company states that "Ongoing dialogue and engagement with key stakeholders to shape Sasol's sustainability journey" is one of its top priorities. [Integrated Report 2018, 06/2018: sasol.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to engage stakeholders in design: The Company states that 'Sasol has developed a stakeholder engagement matrix, which defines roles and responsibilities for stakeholder engagements across the organisation. This is designed to limit multiple engagements by Sasol with the same stakeholder. We have developed an issues management process that, based on a variety of information sources including direct engagements with stakeholders and perception survey, identifies issues that are important to Sasol and its stakeholders. Developments regarding such issues are reported on quarterly to the Policy, Sustainability and Stakeholder Relations (PSSR) Committee, a Sub-Committee of the Group Executive Committee [...] Stakeholders see Sasol as a credible stakeholder partner, making a meaningful social impact, while delivering strategic and business objectives. Stakeholders are willing to collaborate with Sasol, working jointly to manage risks and concerns and to create a supportive environment for Sasol to deliver on our socio-economic promises'. However, no evidence found that stakeholders are engaged in helping the Company to monitor and develop its human rights approach. [Sustainability Report 2019, 06/2019: sasol.com] Not met: Regular stakeholder design engagement: The Company has provided comments to CHRB regarding this indicator. However, no evidence found of regular engagement with affected stakeholders in the design or monitoring of the Company's human rights approach.
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Commits to remedy: Though this point was awarded in the 2017 CHRB Pilot, in the updated code of ethics there is no mention of remedy. [Sasol Code of Conduct (MS_20): sasol.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Not obstructing access to other remedies Not met: Collaborating with other remedy initiatives Not met: Work with EX BPs to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact. Met: Senior responsibility for HR: There is a clear diagram on ethics governance in the company, which allocates the senior responsibility to the Group Executive Committee (GEC) [Sasol Governance of Ethics, 06/2018: sasol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: According to the website, the company's 'Executive Vice President: Advisory and Assurance. On the website it mentions that he is responsible for the day-to-day human rights function and resources.' <p>However, there is no evidence on how the responsibility is cascaded down the company. Additional evidence was not found in more recent documents. [2017 Integrated report: Human capital - human rights, 2017: sasol.com]</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company states that 'We conduct periodic human rights due diligence reviews of our activities and new business opportunities with the aim of avoiding adverse human rights impacts on our workforce, service providers and the communities in which we operate'. <p>However, no evidence found of description of the due diligence process. Additional evidence was not found in more recent documents. [2017 Integrated report: Human capital - human rights, 2017: sasol.com]</p> <ul style="list-style-type: none"> • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The company has an ethics line operated by a third party which is accessible to all workers (specifically mentioned in the sustainability report). It is available in 8 countries and through different means (website) [Make a Tip Off, 06/2018: sasol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The company provides information on how many complaints were filed, how many were found valid and the actions associated with them. However, there is no specific information about human rights related complaints. [Enabling Growth Sustainably (supplemental to Integrated Report 2017), 30/06/2017] • Met: Channel is available in all appropriate languages: The Company discloses that 'The EthicsLine is operated as a toll-free line in South Africa, USA, UK, China, Singapore, Germany, Mozambique, Canada and Italy, and callers can be assisted in different languages, including English, Afrikaans, Zulu, Sotho, Xhosa, Pedi, Venda, Tswana, SiSwati, Ndebele, Mandarin, Portuguese, Italian and German'. [Sustainability Report 2019, 06/2019: sasol.com] • Met: Expect EX BPs to have equivalent grievance system: In the suppliers code of conduct it states that 'The Supplier should have mechanisms to hear, process, and settle the grievances of workers.' [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states that 'Anybody is welcome to contact the EthicsLine about unethical conduct in Sasol. The EthicsLine is a confidential system to report suspected transgressions to the Sasol Code of Ethics' [Make a Tip Off, 06/2018: sasol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Although there is a phone number for various locations, it is not clear if it covers all locations where suppliers are based. [Sustainability Report 2019, 06/2019: sasol.com] • Met: EX BPs communities use global system: As above - the company states that 'Anybody is welcome to contact the EthicsLine about unethical conduct in Sasol. The EthicsLine is a confidential system to report suspected transgressions to the Sasol Code of Ethics' [Make a Tip Off, 06/2018: sasol.com]
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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