

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Sasol
Industry Extractives
Overall Score (*) 25.0 out of 100

Theme Score	Out of	For Theme
3.9	10	A. Governance and Policies
3.2	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
5.0	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
4.2	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows: 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 'subscribes to' and 'endorses' the UN Global Compact. The ToR for its Safety Social and Ethics Committee state that the committee will monitor the company's activities with regard to the 10 principles. [Terms of Reference Sasol Limited - Safety, Social And Ethics committee, 1/07/2017: sasol.com] Met: International Bill of Rights: The company 'subscribes to' and 'endorses' the International Bill of Rights. [Sasol Code of Ethics (Unabridged, v.3 - 2015), 01/07/2015: sasol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: The company 'subscribes to' and 'endorses' the UNGPs. [Sasol Code of Ethics (Unabridged, v.3 - 2015), 01/07/2015: sasol.com] • 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] • Not met: UNGC principles 3-6: The company does not appear to have a publically available statement committing to the UN Global Compact, however the ToR for its Safety Social and Ethics Committee state that the committee will monitor the company's activities with regard to the 10 principles. [Terms of Reference Sasol Limited - Safety, Social And Ethics committee, 1/07/2017: sasol.com] • Met: All four ILO apply to EX BPs: The company's Supplier Code of Ethics explicitly includes commitment to each ILO core area. [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: 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: Health and safety provisions for suppliers are somewhat vague, but its suppliers code states: 'The Supplier must ensure that it provides its workers with safe, suitable and sanitary work facilities. It must also supply its workers with the protective equipment and training necessary to perform their tasks safely'. [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments: The company 'strive[s] to follow the OECD Guidelines for Multinational Enterprises' and notes that 'if national law conflicts with our human rights commitments, we will uphold the international human rights law'. However, there appears to be no explicit reference to UN Conventions in this regard. [Sasol Code of Conduct (MS_20): sasol.com] • Not met: VPs participant: There is no reference to the VPs in the company Code of Conduct. [Sasol Code of Conduct (MS_20): sasol.com] • Not met: Uses only ICoCA members: The company states that it 'pre-screens' all security personnel and makes human rights part of their 'performance agreements', but makes no apparent commitment to use only ICoC members. [Sasol Code of Conduct (MS_20): sasol.com] • Not met: Respecting indigenous rights: Though the company states that it 'strive to work collaboratively and transparently with local communities, in accordance with the principle of free, prior and informed consent', this is not a commitment to respect IR. • Not met: ILO 169 • Not met: UNDRIP • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to respect all these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Regular stakeholder engagement: The company has engaged with stakeholders including communities who are impacted by their activities "We communicate regularly with a broad stakeholder base on issues of significant interest or impact to them, including our performance, decisions and activities in relation to the environment". It also explains the rationale behind it to be 'Maintaining our socio-political licence to operate is core to how we work with our host communities' [Integrated Report 2017, 30/06/2017: sasol.com] Score 2 <ul style="list-style-type: none"> Not met: Commits to engage stakeholders in design Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <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] Score 2 <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
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: CEO or Board approves policy: The Code of Ethics which explains that the company is committed to respecting HR, is signed by the CEO/Presidents. [Sasol Code of Conduct (MS_20): sasol.com] Met: Board level responsibility for HRs: The Company has a Safety, Social and Ethics Committee which is appointed by the Board and includes members of the board which is responsible for HR (monitoring the company's activities according to the 10 GC principles) and health and safety. [Terms of Reference Sasol Limited - Safety, Social And Ethics committee, 1/07/2017: sasol.com] Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board/Committee review of salient HRs: The Safety, Social and Ethics Committee discuss HR and assess the company's performance in 'terms of the goals and purposes of the 10 principles of the GC. [Terms of Reference Sasol Limited - Safety, Social And Ethics committee, 1/07/2017: sasol.com] Score 2 <ul style="list-style-type: none"> Not met: Examples or trends re HR discussion Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Senior responsibility fo HR (inc ILO): 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, June 2018: sasol.com] Score 2 <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.' However, there is no evidence on how the responsibility is cascaded down the company. [2017 Integrated report: Human capital - human rights, 2017: sasol.com] Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key EX HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR part of enterprise risk system: The company states that as part of its risk assessment before entering a country, HR assessment is part of the general risk assessment. However, there is limited details on how the company integrates HRs risk assessments into its general ERMs on the website. [2017 Integrated report: Human capital - human rights, 2017: sasol.com] Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Communicates its policy to all workers in own operations: The Code of Ethics is available in all languages of the countries in which the company operates. Also, the company states that 'To ensure that this Code of Ethics is consistently understood and applied throughout the group, we will provide the necessary training and awareness-raising programmes as part of our efforts to advance an ethical culture and promote respect for human rights.' [Sasol Code of Ethics (Unabridged, v.3 - 2015), 01/07/2015: sasol.com] Score 2 <ul style="list-style-type: none"> Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Steps to communicate policy commitments to BRs: The Company has a supplier code of ethics which applies to all business partners. The Policy is accessible on the company website. According to the company 'In the present and future commercial relations between Sasol and its Suppliers, the latter will be requested to accept and sign a written commitment to the principles provided in this Code of Ethics.' [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com] Score 2 <ul style="list-style-type: none"> Met: Including to EX BPs: The code applies to all BR including extractives [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com] Met: How HR commitments made binding/contractual: According to the company 'In the present and future commercial relations between Sasol and its Suppliers, the latter will be requested to accept and sign a written commitment to the principles provided in this Code of Ethics.' [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com] Met: Including on EX BPs: See above
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Trains all workers on HR policy commitments: Though the company mentions in its sustainability report that it trains staff on the code of ethics, there is no details on whether it is all or the relevant managers [Enabling Growth Sustainably (supplemental to Integrated Report 2017), 30/06/2017: sasol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Trains relevant managers including security personnel: See above Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring EX BP's Score 2 <ul style="list-style-type: none"> • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR affects selection extractives business partners: In its supplier code of ethics the company says "We reserve the right to decide which entities we do business with and we will only do business with companies or institutions that have integrity and that ascribe to similar values and ethics as ours. Our relations with all suppliers, customers and business partners will be based solely on objective business criteria; these include in particular quality, reliability and competitive prices, as well as compliance with standards relating to safety, the environment, and human rights and applicable laws." [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com] Score 2 <ul style="list-style-type: none"> • Met: HR affects on-going business partner relationships: See above • Not met: Both requirement under score 1 met • Not met: Working with business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Stakeholder process or systems: The company identifies a variety of stakeholders including local communities "who are directly or indirectly affected by our operations". According to its report stakeholder engagement approach is supported by open and effective communication, clear and agreed-on feedback processes, mutually beneficial outcomes where possible and inclusiveness and integrity. We participate in initiatives to inform and ensure a best-practice approach in the areas of sustainability and social impact. We actively engage with our stakeholders to ensure the achievement of the best outcomes and strive towards a sustainable multistakeholder approach to solve difficult challenges. Our strong commitment to the communities in which we operate drives our approach to sustainability. This includes socio-economic development, responsible business, transparency, health and partnership in infrastructure provision." [Integrated Report 2017, 30/06/2017: sasol.com] • Not met: Frequency and triggers for engagement: The company describes the different stakeholders and their engagement as well as the concerns of each group. However, it does not specifically mention HR as one of the subjects/triggers. [Integrated Report 2017, 30/06/2017: sasol.com] • Not met: workers in SP engaged: Though employees are mentioned as key stakeholder group, it does not elaborate whether supply chain ones are included. • Met: communities in the SC engaged: See above Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: Though the company does provide analysis of stakeholders views and its actions on them, those are not related to HR.

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners Score 2 <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)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Salient risk assessment (and context): Though 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' it does not explain what they consider to be the salient human rights risks. [2017 Integrated report: Human capital - human rights, 2017: sasol.com] Not met: Public disclosure of salient risks Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks Not met: Example of Actions decided Not met: Including amongst EX BRs Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <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 BRs Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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	The individual elements of the assessment are met or not as follows: Score 1 <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, June 2018: sasol.com] Score 2 <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: sasol.com] Not met: Channel is available in all appropriate languages: Though the company has phone numbers for call centres in different countries, there is no specific information on what languages are used in those local call centres 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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns from external individuals and communities		is a confidential system to report suspected transgressions to the Sasol Code of Ethics' [Make a Tip Off, June 2018: sasol.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Though there is a phone number for various locations, there is no information on whether they are in local languages. • Met: EX BP 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, June 2018: sasol.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Response timescales: The company describes its process: "Within one workday from submitting your report, Tip-offs Anonymous will submit the report to the Group Ethics Office for appropriate follow up action. All valid reports will be investigated where appropriate and possible (e.g., should sufficient information be provided) and the appropriate corrective action will be taken." In addition, the complainants receive a reference number. [Make a Tip Off, June 2018: sasol.com] • Met: How complainants will be informed: see above Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: In its code of ethics the company specifically states that 'We strictly prohibit any form of retaliation, intimidation, harassment or victimisation against an employee who in good faith makes a report or raises a concern that he or she reasonably believes to be a violation of Sasol's Code of Ethics.' However, it does not mention other stakeholders. [Sasol Code of Ethics (Unabridged, v.3 - 2015), 01/07/2015: sasol.com] • Met: Practical measures to prevent retaliation: The EthicsLine is operated by a third party external to Sasol and the company allows anonymity (though does not encourage it): 'you are not required to identify yourself and may remain anonymous (unless prohibited by the legislation in your country). However, it is important to note that if you opt to remain anonymous, the reported matter may be very difficult or even impossible to investigate.' [Make a Tip Off, June 2018: sasol.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BRs to prohibit retaliation: As stated in the supplier code: 'Suppliers must provide reasonable assistance to any investigation by Sasol of a violation of this Code and they must protect anyone who works for them, either as an employee or a contractor, from any form of retaliation for reporting actual or potential violations.' [Sasol Supplier Code of Ethics, 27/10/2016: sasol.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		Score 2 <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

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI • Not met: Reports of taxes beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company states 'We recognise and respect our employees' right to choose to associate or not to associate with organised labour entities, such as a legally recognised labour union, without fear of intimidation, discrimination, reprisal or external pressure. We will seek to work in good faith with recognised trade unions and other recognised bodies that our employees collectively choose to represent them within the appropriate legal framework. Where employees are represented by a recognised organised labour entity, we will establish dialogue with freely chosen employee representatives to enable management and employees to understand each other's views. We are committed to engaging in the collective bargaining process in good faith.' [Sasol Code of Ethics (Unabridged, v.3 - 2015), 01/07/2015: sasol.com] • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The company reports on injury rates in detail in its annual report - 'Our safety Recordable Case Rate (RCR), excluding illnesses, improved to 0,28, however the high severity of injuries remains a concern. Regrettably, five fatalities occurred.' [Integrated Report 2017, 30/06/2017: sasol.com] • Met: Lost days or near miss disclosures: RCR is a measure which includes lost days • Met: Fatalities disclosures: The company published the number of fatalities in the annual report [Integrated Report 2017, 30/06/2017: sasol.com] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The company set out zero harm policy and explains the trends around H&S: ' Despite our Recordable Case Rate (RCR) declining steadily, the number of high severity injuries, as evidenced by the fatalities and life-altering injuries, is not declining. The past year was a challenging one for safety performance' [Integrated Report 2017, 30/06/2017: sasol.com] • Met: Met targets or explains why not: See above [Integrated Report 2017, 30/06/2017: sasol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Process to identify indigenous rights holders Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> Not met: Commits to FPIC (or ICMM) Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Approach to identification of land tenure rights holders Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> Not met: How valuation and compensation works Not met: Steps to meet IFC PS 5 in state deals Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: How implements security (inc VPs or ICOC) Not met: Example of respecting HRs in security Not met: Ensures Business Partners follow security approach Score 2 <ul style="list-style-type: none"> Not met: Assesses and involves communities Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Action to prevent water and sanitation risks: The company is a signatory to the CEO Water Mandate and 'we have again published an annual Communication on Progress against the 6 focus areas of the Mandate' [Enabling Growth Sustainably (supplemental to Integrated Report 2017), 30/06/2017: sasol.com] Score 2 <ul style="list-style-type: none"> Not met: Water targets considering local factors Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity thresholds were found, and so the score of 19.98 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.99 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.79 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Sasol made data public that met one or more elements of the methodology in 17 cases, leading to a disclosure score of 1.79 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Met: Company reports on GRI
F.3	Key, High Quality Disclosures	0.4 out of 4	Sasol met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> Not met: Score 2 for A.2.2 : Board discussions Not met: Score 2 for B.1.6 : Monitoring and corrective actions Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.