

Group Policy: Sasol Gifts, Entertainment and Hospitality Policy

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Document owner **Senior Manager Ethics**

Administration **To ensure the use of the authorised copy, the document must be downloaded from its authoritative source**

Approval

Designation of approver **EVP Strategy, Sustainability and Integrated Services**

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Date of approval **03/06/22**

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1. Introduction

The exchange of Gifts, Hospitality and Entertainment is a common practise in business relationships and can be useful in strengthening these relationships and showing respect and appreciation for business partners.

The giving and receiving of Gifts, Entertainment and Hospitality is however regulated by various regulatory bodies globally due to concerns that they may lead to bribery and corruption.

Sasol prohibits the offering, or receipt, of any Gifts, Entertainment and or Hospitality if these can affect or be perceived to affect the outcome of business transactions or if they are not in-line with this Policy.

2. Purpose / Objective

2.1 The purpose of this Policy is to:

2.1.1 Provide details of Sasol's approach in respect of the offering or receipt of Gifts, Entertainment and Hospitality;

2.1.2 Outline the types of Gifts, Entertainment and Hospitality which will be inappropriate; and

2.1.3 Provide details as to the requirements when receiving or offering Gifts, Entertainment and Hospitality to Public Officials.

2.2 Sasol has a zero tolerance to any unethical or illegal conduct irrespective of how it affects its business and thus Sasol is committed to ensuring that the giving or receiving of Gifts, Entertainment, Hospitality or any other business courtesies are dealt with in a manner that does not create a conflict of interest for its Employees or counterparties and which will not result in breaches of any global anti-corruption laws. Additional information about conflicts of interest can be obtained in Sasol's Conflict of Interest Policy.

3. Definitions

3.1 **"Approver"** is the person who is tasked with assessing a request for pre-approval of a Gift, Entertainment or Hospitality event made by an Employee. An Approver must be an Employee who is at the role category of "Specialisation" or above.

3.2 **"Entertainment"** refers to the provision of meals, such as lunches, breakfast or dinners.

3.3 **"Employee"** is any person who has entered into a contract of employment with Sasol and who receives or is entitled to receive remuneration and includes all executive directors and officers.

3.4 **"Gifts"** means anything of value including money, vouchers, goods, services, discounts, branded items, loans, favourable terms given to an Employee in his personal capacity on any product or service, transportation, use of vehicles or vacation facilities, shares or other securities, home improvements, usually given as mark of friendship or appreciation.

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- 3.5 **“Hospitality”** includes, receptions, tickets to entertainment, social or sports events, lodging, accommodation, or travel. It is usually an all-inclusive experience including meals or drinks and promotional items. Entertainment and hospitality may be offered together as one event. The host must be present at the event. If the host is not present it is regarded as a gift.
- 3.6 The **“Policy”** refers to this Sasol Gifts, Entertainment and Hospitality Policy.
- 3.7 **“Procedure and Guideline”** is the Sasol Gifts, Entertainment and Hospitality Procedure and Guideline document detailing the processes and procedures to be followed when declaring and managing the giving and receiving of Gifts, Entertainment and Hospitality.
- 3.8 **“Public Officials”** include:
- 3.8.1 an employee or officer of a government entity, state owned entity or department, agency or instrumentality thereof;
 - 3.8.2 any person acting in an official capacity for or on behalf of any such government or functionary;
 - 3.8.3 any federal, state, regional, county or municipal working person or functionary;
 - 3.8.4 employee or officer of an organization authorized by the local government to perform government functions;
 - 3.8.5 personnel of federal, state, regional, county or municipality -owned or -controlled commercial corporations, enterprises, institutions or organizations (whether partially or wholly owned);
 - 3.8.6 outside directors of state, regional, county or municipality -owned entities;
 - 3.8.7 legislators (whether full or part-time);
 - 3.8.8 person holding an honorary or ceremonial government position;
 - 3.8.9 political party officials, and candidates for political office; and
 - 3.8.10 officers or employees of public international organizations such the World Bank.
- 3.9 **“SDS”** means the Sasol Declaration System which is an electronic platform to be used by Employees to declare any conflicts of interest and to seek pre-approval for the receipt or offering of Gifts, Entertainment and Hospitality.
- 3.10 **“SharePoint Approval Site”** means the automated Gift, Entertainment and Hospitality pre-approval process used in Eurasia which is located on the Compliance Intranet page.
- 3.11 **“Sasol”** means Sasol Limited, its subsidiaries and Sasol operated joint ventures.

4. Owner of this Policy

The Group Ethics Office is the custodian of this Policy, and the Senior Manager Ethics is the owner.

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5. Scope and Application

- 5.1 This Policy applies to the Sasol Group as a whole, inclusive of all Employees, legal entities and subsidiaries including joint ventures to the extent that Sasol has majority shareholding and/or management control and subject to the acceptance and approval of the Policy by the respective entities' Board of Directors or other responsible corporate decision-making body. Entities in which Sasol does not have majority shareholding and/or management control are encouraged to apply this policy or a similar standard.
- 5.2 In any country where this Policy conflicts with regulatory requirements, such local regulatory requirements shall override this Policy to the extent required.
- 5.3 This Policy must be read and understood in conjunction with the Sasol Anti-Bribery Policy and the Sasol Conflicts of Interest Policy and Sasol Code of Conduct.
- 5.4 This Policy is applicable to all Gifts, Entertainment or Hospitality offered to or received from Sasol customers, service providers, suppliers, business partners, advisors, Public Officials and any individual or entity that has or seeks a business relationship with Sasol.
- 5.5 Gifts, Entertainment or Hospitality offered between Sasol Employees do not fall within the scope of this Policy. However, if such Gifts, Entertainment or Hospitality may result in an actual, perceived or potential conflict of interest, then the principles set out in the Sasol Conflict of Interest Policy may be applicable.

6. Inappropriate and impermissible Gifts, Entertainment and Hospitality.

- 6.1 It is important to note that the appropriateness of any Gifts, Entertainment or Hospitality must first be considered prior to assessing the value thereof. Even small or low value items could be inappropriate in certain circumstances.
- 6.2 Sasol prohibits the offering, or receipt, of any Gifts, Entertainment or Hospitality if they can affect or be perceived to affect the outcome of business transactions.
- 6.3 Sasol prohibits the offering of any Gifts, Entertainment or Hospitality if they are made with the intent of influencing a Public Official to, amongst others, retain or obtain any advantage from them. Additional requirements applicable to the giving of Gifts, Entertainment or Hospitality to Public Officials are set out in clause 8 below.
- 6.4 Sasol prohibits the accepting or offering of gifts which are in the form of cash or a cash equivalent such as shares, vouchers, coupons, prepaid or prefunded debit cards, and gift cards.
- 6.5 Sasol prohibits the offering or accepting of Gifts, Entertainment or Hospitality which are above the monetary thresholds set out in clause 7.3 below, unless these have been pre-approved in accordance with the process set out in the Procedure and Guideline document.
- 6.6 Sasol prohibits the offering or accepting of Gifts, Entertainment or Hospitality if the parties are engaged in a tender or competitive bidding process, pending legal proceedings, or sensitive negotiations.
- 6.7 Sasol prohibits the offering of any Gifts, Entertainment or Hospitality which creates any perception on the recipient to reciprocate or places the recipient under any obligation, or which are made secretly and not fully documented in accordance with Sasol's processes.

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- 6.8 No Employee may receive or offer more than three Gifts, Entertainment or Hospitality items / events from or to the same entity within one financial year, unless the fourth or any subsequent item or event has been approved in accordance with the process set out in the Process and Guideline document. Low value gestures received from or provided to suppliers or customers such as the purchase of a cup of coffee or snack as part of site visits etc. will not form part of the tally of the number of Gifts, Entertainment and Hospitality for the purpose of this clause.
- 6.9 No family members or close friends may be given Gifts, Entertainment or Hospitality in the guise that they are suppliers or customers, and no family members or other third parties may accept any Gifts, Entertainment or Hospitality to evade this Policy.
- 6.9 Sasol prohibits the offering or accepting of Gifts, Entertainment or Hospitality that are of an indecent nature or at an inappropriate venue.
- 6.10 Gifts, Entertainment or Hospitality should only be accepted or offered if the intention thereof is to build and strengthen the business relationship with Sasol.
- 6.11 Sasol prohibits the offering of Gifts, Entertainment or Hospitality, if it is known that this will violate the recipient's policy or codes of conduct, or local regulatory requirements.
- 6.12 Sasol Employees may not solicit or induce any third party to provide him or her with any Gifts, Entertainment or Hospitality.

7. Considerations for determining the appropriateness of Gifts, Entertainment and Hospitality

- 7.1 Any Gift, Entertainment or Hospitality offered or received must:
 - 7.1.1 Comply with applicable local regulatory requirements and be customary in that region or country;
 - 7.1.2 Be limited to expenditures which are reasonable, proportionate and business related;
 - 7.1.3 Must be of a value which is below the thresholds set out in clause 7.3 unless pre-approval has been obtained.
 - 7.1.4 Be intended to promote the brands, products and services of Sasol or the entity giving it;
 - 7.1.5 Be offered in the normal course of business dealings;
 - 7.1.6 Neither be offered nor received too frequently- see clause 6.8 above;
 - 7.1.7 Be appropriate considering the culture and standard of living in the country or region where the Gift, Entertainment or Hospitality is given or received;
 - 7.1.8 Be given openly and transparently to the recipient; and
 - 7.1.9 Of a nature that would not harm Sasol's reputation if publicly disclosed.
- 7.2 If the cost of the Gift, Entertainment or Hospitality is above the threshold amounts set out in the table in clause 7.3 below, then Employees must obtain written pre-approval for the giving or receiving of that Gift, Entertainment or Hospitality. The threshold amount will depend on the geographic region in which the recipient of the Gift, Entertainment or Hospitality is located. The process to obtain pre-approval is detailed in the Process and Guideline Document.

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

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

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

7.5 Promotional items of a low value such as branded caps, pens, shirts, mugs and diaries may be offered or received in reasonable quantities.

7.6 It is essential that the details of all Gifts, Entertainment and Hospitality received or offered are recorded transparently and accounted for within the relevant Sasol business. Included in the detailed paper trail must be sufficient details as to the purpose of the Gift, Entertainment or Hospitality, the names of all recipients, the amount and nature of the expenditure and relevant dates. Please note that this requirement is applicable to all Gifts, Entertainment and Hospitality received or offered and it is not limited only to those which require pre-approval.

7.7 For Entertainment or Hospitality events which include trips, plant /site tours and similar on-site visits, not only the gifts, meals and entertainment provided should be recorded and detailed but also the itinerary of business events and/or meetings associated with the visit must be captured and recorded.

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- 7.8 When offering Hospitality or Entertainment the business activities should predominate over entertainment or personal activities and the location of such activities should have a nexus to Sasol (i.e. the location of Sasol plants, offices, logistical “half-way” point).
- 7.9 Sasol employees must attend Hospitality or Entertainment events that they offer so as to support the business justification or relationship building requirements of these.
- 8. Additional considerations for determining the appropriateness of Gifts, Entertainment and Hospitality given to or received from Public Officials**
- 8.1 Some countries have different and/or stricter rules when dealing with Gifts, Entertainment or Hospitality to Public Officials. Extra caution must therefore be exercised by all employees when giving or receiving Gift, Entertainment or Hospitality to or from Public Officials. Please refer to the Sasol Anti-Bribery Policy requirements or seek advice from your Ethics Officer or the Centre of Expertise for Governance Laws within Sasol Legal Services if you are unsure how to proceed.
- 8.2 Note that written pre-approval must always be obtained from the Approver in the Sasol business that is giving or receiving any Gift, Entertainment or Hospitality to/from a Public Official, regardless of the value of such Gifts, Entertainment or Hospitality. If the person giving or receiving the Gift, Entertainment or Hospitality is at Specialisation, then approval must be sought from the next level line manager.
- 8.3 The Centre of Expertise for Governance laws within Sasol Legal Services must also always be consulted in writing regarding any proposed Gift, Entertainment or Hospitality to or from Public Officials.
- 8.4 The government agency or state-owned entity should be notified of any Gift, Entertainment or Hospitality offered to its representatives.
- 8.5 No Sasol employee may give, promise, offer or authorise the payment of any hosting expenses, nor the giving of any Gift, Entertainment or Hospitality to a Public Official if it could be viewed as a bribe or otherwise be viewed as influencing the official’s decision.
- 8.6 As mentioned in clause 7.6 and 7.7 above, it is essential that detailed and transparent paper trails are maintained regarding all Gift, Entertainment or Hospitality offered to Public Officials.
- 8.7 Sasol must have control over the Entertainment and Hospitality that is provided and must not pay per diems (unless required by law) nor reimburse “personal activities” that a Public Official decided to participate in whilst on the site visit or business trip.
- 8.8 Entertainment and Hospitality must be provided only to those individuals that have a legitimate business purpose for attending the event. Sasol must not pay for or reimburse expenses for spouses, family members or other persons who do not have such a legitimate business purpose.
- 8.9 Any travel or accommodation offered to Public Officials must be consistent with the type of travel and accommodation offered to Sasol employees, and must be restricted to travel to and from places of business. Sasol may not pay for or reimburse for travel arrangements that include side trips that are of a personal benefit.

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9. Reporting of violations and Consequences of non-compliance

- 9.1 Any non-adherence to this Policy may lead to disciplinary action in accordance with Sasol’s approved disciplinary processes, which may include dismissal.
- 9.2 Should you feel that any attempt is being made by a third party to unfairly influence you through the giving or offering of Gifts, Entertainment or Hospitality, you are required to inform your OME Ethics Officer, the Group Ethics Office or the CoE Governance Laws.
- 9.3 Sasol is committed to ensuring that Employees can speak up with confidence if they have any concerns or need to ask for help. If you suspect or observe anything that you think might be in contravention of this Policy, you have an obligation to report it. You should raise your concerns with your line manager, legal advisor or through the Sasol Ethics Line.
- 9.4 Personal data gathered during the pre-approval process will be handled in accordance with local data protection laws.

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