



# DECLARATION OF HUMAN RIGHTS PRINCIPLES 2025

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Sasol Germany GmbH



## **I. Commitment to respecting human rights and the associated environmental standards.**

As part of the global Sasol Group, a leading integrated chemical and energy company, Sasol Germany GmbH recognizes that respect for human dignity and the rights of all people, as set out in the International Bill of Human Rights, is essential to the sustainability of our business.

As an international company with a global value chain, we bear a particularly high level of responsibility for all employees and society. We are aware of this global responsibility and are actively committed to compliance with laws, international standards of conduct and human and environmental rights, both in our own business area and along our value chain. This includes, in particular, the prohibition of child and forced labor, the prohibition of all forms of slavery and discrimination and the strengthening of freedom of association. We are also committed to upholding occupational health and safety, paying appropriate wages, prohibiting environmental pollution and forced eviction, as well as the use of security forces if their use entails the risk of human rights being disregarded or restricted, and are committed to a deforestation-free supply chain.

Our actions are based on the following standards:

- International Charter of Human Rights,
- United Nations Global Compact (UNGC),
- United Nations (UN) Guiding Principles on Business and Human Rights,
- The UN Sustainable Development Goals applicable to our company,
- Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work and its Follow-up
- Voluntary UN principles on security and human rights for companies in the extractive sector,
- International Code of Conduct for Private Security Service Providers,
- the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD) and the
- Ten principles of the UN Global Compact, which we signed in 2001.

We always comply with applicable national law. In cases where international human rights standards go beyond local laws, we strive to promote the principles behind the international standards in accordance with local laws.

Our commitment to respecting and strengthening human and environmental rights also manifests itself in voluntary initiatives that we support

- World Business Council for Sustainable Development
- Together for Sustainability
- Responsible Care Global Charter

We regularly have our progress towards becoming a sustainable company and the implementation of the commitments we have made with regard to achieving the Sustainable Development Goals (SDGs) audited externally and certified by EcoVadis.

This declaration supplements the existing internal company guidelines:

[Human Rights Policy](#)

[Sasol Code of Conduct](#)

[Supplier Code of Conduct](#)

The Sasol Code of Conduct (CoC) is a binding guideline for all employees and managers worldwide. Our employees are regularly trained in the CoC and are obliged to implement the values defined therein in their daily actions in their own business area and also towards third parties. Adherence to the CoC is regularly monitored by our Group-wide compliance management system.

## **II. Implementation**

The following risk management system has been established at Sasol Germany to ensure compliance with our due diligence obligations.

### **1. Risk analysis**

As a chemical manufacturing company, we have an influence on human rights and environmental risks both in our own business area and at our direct suppliers.

We regularly identify and review the relevant risks as part of our company-wide risk management.

As a chemical company, our abstract risks primarily concern the safety and health of our own employees as well as that of external companies and neighbors at our sites. The operation of chemical plants also generally entails a high abstract environmental risk due to soil, water or air contamination.

The risks identified as part of our risk analysis and their prioritization are based on our industry, our company profile with its regional activities, the expected severity of the impact, the probability of occurrence and, within our value chain, our ability to exert influence.

To analyse our supply chain, we first determined the respective country risk and selected established governance indicators relating to human rights that are regularly collected by various recognized institutions. For the environmental assessment of the country risk, we used Yale University's Environmental Performance Index as well as the fact whether the country committed to the relevant conventions and the recognition status of the respective convention in this country. We also carried out a product group-related risk assessment, using both the assessment of the Federal Ministry of Labor and Social Affairs and the Human Rights Guidance Tool of the United Nations UNEP FI.

We have identified the following priority risks for our own business operations:

- Incidents involving significant product spills and/or fatalities during product transportation
- Operation of high-risk devices and systems
- Serious personal injury during passenger transportation
- Exposure to non-life-sustaining atmospheres
- Exposure to electricity
- Falling objects during lifting operations
- Long-term exposure to occupational stress factors

- Falling from a great height

We counter these identified risks with the preventive measures listed below.

## **2. Preventive measures**

The health and safety of our employees is our top priority. We consistently adhere to the applicable occupational health and safety laws and also have our own high standards for safety in the workplace. We use DIN EN ISO certification standards to continuously improve occupational and process safety, health protection and environmental protection. Our employees receive regular safety training and have access to internal and external health-promoting measures and training courses.

Compliance with these standards is regularly audited internally and externally.

Our integrated management system and our global policies, guidelines and standards relating to safety, health and environmental protection form the basis of our value-oriented actions and safe conduct.

Our measures include proven tools such as root cause analysis and best practice sharing, in which we share experiences and findings from near-accidents or incidents within the company in order to prevent the incident from actually occurring or being repeated.

The human rights risks in the area of our business activities exist primarily in the upstream value chain. We have therefore developed a Supplier Code of Conduct for our suppliers, which sets out binding criteria for responsible conduct in accordance with ethical and legal standards and is updated regularly. In this way, we want to ensure that our suppliers fulfill the same requirements that are binding for us. It relates to four critical areas of influence: Business integrity, human rights and labor standards, occupational health and safety, and environmental protection. We take human rights and certain environmental criteria into account when selecting and evaluating our suppliers and implement appropriate control measures. Employees working in the relevant business areas are regularly trained accordingly. Before entering into a business relationship with a direct supplier company, it is checked for compliance with human rights and environmental expectations. In addition to selecting and reviewing our direct suppliers, we have defined further preventive measures that can be applied to suppliers with an increased, medium or high human rights or environmental risk identified by, depending on the circumstances.

## **3. Remedial measures**

If we identify a human rights or environmental breach of duty at a supplier, we immediately take appropriate measures to prevent, end or minimize the breach. If the supplier is unable to remedy the breach of duty in a timely manner, a concept for termination or minimization with a specific timetable is drawn up and monitored. If the supplier has little influence, cooperation with other companies within the framework of industry initiatives and standards is examined. If the breach of duty is serious and no improvement is foreseeable, the business relationship may be terminated as a last resort. The same graduated measures apply if there are actual indications that one of our indirect suppliers may be in breach of a human rights or environmental obligation.

#### **4. Complaints mechanism**

In order to systematically prevent or counteract violations, we have established the [Sasol EthicsLine](#), which is available in several languages and which employees, customers, suppliers, employees in the supply chain and other third parties can use to report irregular behavior or express concerns. The reporting of complaints via the Sasol EthicsLine is confidential and discreet.

#### **5. Documentation, auditing and reporting**

The fulfillment of our due diligence obligations is continuously documented within the company and these documents are stored accordingly.

Compliance with our human rights and environmental commitments is reviewed annually and on an ad hoc basis by our Audit and/or Compliance department and by our Human Rights Officer.

We will also report annually to the relevant authority on the significant human rights and environmental risks identified and on the impact of our business activities within our supply chain in accordance with legal requirements. This report will be published on our website.

#### **6. Declaration of principle**

This policy statement comes into force on January 1, 2025 and will be reviewed and updated annually and on an ad hoc basis if required by current changes and processes or if we identify changed risks.



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