

# Global Reporting Initiative (GRI) G3 Content Assessment

## STANDARD DISCLOSURES PART I: Profile Disclosures

OK = No Concerns; LC = Limited Concern; NC = Not Covered; NA = Not Applicable

### 1. Strategy and Analysis

Profile Disclosure	Description	Reference	Section	Comments	B
1.1	Statement from the most senior decision-maker of the organization	pp. 8 - 9	Chairman's Statement	No concerns.	OK
1.2	Description of key impacts, risks, and opportunities.	p. 22	Key impacts, risks, and opportunities	Limited concerns. A reasonable mention of some of TH's key IROs is provided, although additional detail could likely be provided, as well as consideration of other matters such as ongoing access to land for cultivation and/or community resettlements and/or interaction.	LC

### 2. Organisational Profile

Profile Disclosure	Description	Reference	Section	Comments	B
2.1	Name of the organization.	Throughout	FC and throughout	No concerns.	OK
2.2	Primary brands, products, and/or services.	pp. 2 - 6, 25	Introduction / Leading brands	No concerns.	OK
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	p. 7	Operations at a glance	No concerns.	OK
2.4	Location of organization's headquarters.	p. 7	Operations at a glance	No concerns.	OK
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	p. 7	Operations at a glance	No concerns.	OK
2.6	Nature of ownership and legal form.	pp. 24 - 25, 118	Organisational Profile / Corporate Information	No concerns.	OK
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	pp. 11 - 21	Chief Executive's Review	No concerns.	OK
2.8	Scale of the reporting organization.	p. 7	Operations at a glance	No concerns.	OK
2.9	Significant changes during the reporting period regarding size, structure, or ownership.		GRI Index	There were no significant changes in the size, structure or ownership of the company, nor were there any significant changes in the group's operations.	OK
2.10	Awards received in the reporting period.	p. 21	Many Successes	No concerns.	OK

### 3. Report Parameters

Profile Disclosure	Description	Reference	Section	Comments	
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	pp. 22 - 23	Reporting Boundaries	No concerns.	OK
3.2	Reporting period (e.g., fiscal/calendar year) for information provided.	pp. 22 - 23	Reporting Boundaries	No concerns.	OK
3.3	Reporting cycle (annual, biennial, etc.)	pp. 22 - 23	Reporting Boundaries	No concerns.	OK
3.4	Contact point for questions regarding the report or its contents.	p. 40	Request for feedback	No concerns.	OK
3.5	Process for defining report content.	pp. 22 - 23	Reporting Boundaries	The process for defining report content is discussed in more of an implicit manner than an explicit one. Future reports would be well-served by being more specific about whether or not stakeholder concerns are considered, key risks/incidents arose to affect content, etc.	LC
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	pp. 22 - 23	Reporting Boundaries	Limited concerns. It would be useful to more explicitly define how the report adheres to the specifics of the boundary protocol found within the GRI's guidance materials.	LC
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope). I	pp. 22 - 23	Reporting Boundaries	No concerns.	OK
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	pp. 22 - 23	Reporting Boundaries	Limited concerns. The boundaries of the report clearly explain what is included (i.e., the various territories), including a statement about this report setting the baseline for future comparability, but there is no explicit mention of any exclusions - if they exist.	LC
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	pp. 22 - 23 and throughout	Reporting Boundaries / Relevant sections	Limited concerns. The way in which data is collected, collated and/or reported is implied in the presence of said data. TH should seek to better explain how data is measured - including control procedures to ensure accuracy, consistency, completeness and reliability - in future reports.	LC
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).		GRI Index	There were no re-statements of information from last year's report.	OK
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	pp. 22 - 23	Reporting Boundaries	This report forms the basis for future comparability.	OK
3.12	Table identifying the location of the Standard Disclosures in the report.		GRI Index	The GRI index table is referred to as a downloadable appendix to the report.	OK
3.13	Policy and current practice with regard to seeking external assurance for the report.	p. 41	Independent Assurance Statement	No concerns.	OK

#### 4. Governance, Commitments, and Engagement

Profile Disclosure	Description	Reference	Section	Comments	
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	pp. 42 - 52	Board Committee Structures and Responsibility - Management Committees	No concerns.	OK
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	pp. 42, 53	Board of Directors / Directorate	No concerns.	OK
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	pp. 53 - 55	Directorate	No concerns.	OK
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	p. 36	Stakeholder engagement	No concerns.	OK
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	pp. 50 - 51	Remuneration Report	Limited concerns. Performance-linked remuneration of execs and the board is mentioned, but more could be done to explain how remuneration throughout the organisation is linked to performance - including sustainability matters.	LC
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	pp. 49 - 50	Accountability and Internal Control	No concerns.	OK
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	pp. 42 - 44, 48 - 49	Board of Directors / Nomination Committee	Limited concerns. A reasonable discourse of recruitment and ongoing training of directors is provided, but not necessarily with respect to ensuring that adequate skills are in place to manage sustainability issues.	LC
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	p. 50	Code of Business Conduct and Ethics	No concerns.	OK
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	pp. 46 - 47	Risk & SHE Committee	No concerns.	OK
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	pp. 42 - 44, 50 - 51	Board of Directors / Remuneration Report	Limited concerns. A reasonable discourse of evaluation and ongoing training of directors is provided, but not necessarily with respect to ensuring that adequate skills are in place to manage sustainability issues.	LC
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	pp. 47 - 48	Risk Management Process	No concerns.	OK

4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	pp. 6, 21, 37	Strategy & Analysis / Sustainability / Stakeholder Engagement	Mention is made in the report of alignment with the CDP, JSE SRI, the KZN Department of Economic Development (Operation Vuselela)... and a URL is given to direct readers to information about other partnerships and initiatives.	LC
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	pp. 6, 21	Sustainability, Strategy & Analysis	Limited concerns. Mention is made of involvement in the NBI and BUSA. More information could be provided about all of the specific memberships in associations...particularly industry associations in the operational areas.	LC
4.14	List of stakeholder groups engaged by the organization.	pp. 36 - 37	Stakeholder Engagement	A list of stakeholder groupings is provided although more detail / specifics could be provided regarding actual organisations that are regularly engaged.	OK
4.15	Basis for identification and selection of stakeholders with whom to engage.	pp. 36 - 37	Stakeholder Engagement	A reasonable discussion is afforded regarding what stakeholders are engaged, and for what purposes (i.e., why they are engaged).	OK
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	pp. 36 - 37	Stakeholder Engagement	A reasonable discussion is afforded regarding what stakeholders are engaged, and for what purposes (i.e., why they are engaged). More detail could be provided regarding frequency and outcomes of engagement.	LC
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	pp. 36 - 37	Stakeholder Engagement	A reasonable discussion is afforded regarding what stakeholders are engaged, and for what purposes (i.e., why they are engaged). More detail could be provided regarding frequency and outcomes of engagement.	LC

#### Standard Disclosures Part II: Disclosures on Management Approach (DMAs)

G3 DMA	Description	Reference	Section	Comments	
DMA EC	Disclosure on Management Approach EC	pp. 37 - 39	Economic Sustainability - Management Approach	Limited concern. A brief overview of TH's management approach to economic sustainability is provided, but more detail could be afforded with respect to policies, procedures and/or controls.	LC
DMA EN	Disclosure on Management Approach EN	pp. 24 - 27	Environmental Stewardship - Management Approach	No concerns.	OK
DMA LA	Disclosure on Management Approach LA	p. 29	Social Performance - Management Approach	Limited concern. A brief overview of TH's management approach to social performance is provided, but more detail could be afforded with respect to policies, procedures and/or controls.	LC
DMA HR	Disclosure on Management Approach HR	p. 29	Social Performance - Management Approach	Limited concern. A brief overview of TH's management approach to social performance is provided, but more detail could be afforded with respect to policies, procedures and/or controls.	LC

DMA SO	Disclosure on Management Approach SO	p. 29	Social Performance - Management Approach	Limited concern. A brief overview of TH's management approach to social performance is provided, but more detail could be afforded with respect to policies, procedures and/or controls.	LC
DMA PR	Disclosure on Management Approach PR	p. 28	Food Safety / GRI Index	Limited concern. A minimal statement is made within the report about food safety, but it should be noted that TH has a comprehensive system of product responsibility policies, procedures and controls. The key PR issues for TH is food safety, as well as packaging and responsible agriculture (land use, water conservation and pesticide/ insecticide use). More detail should be provided within future reports.	LC

### Standard Disclosures Part III: Performance Indicators

#### Economic

Performance Indicator	Description	Reference	Section	Explanation	
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	pp. 39 - 40	Socio-Economic Development / Value Added Analysis	Limited concerns. A Value Added Statement is included, but more detail could be provided regarding the specifics of how wealth is distributed.	LC
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	N/A	N/A	Not covered.	NC
EC3	Coverage of the organization's defined benefit plan obligations.	N/A	N/A	Not covered.	NC
EC4	Significant financial assistance received from government.	p. 37	Stakeholder Engagement	A URL is given to direct readers to information about 'Government Partnerships with Tongaat Hulett'. The URL links to a table outlining the projects...and values.	OK
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	pp. 33 - 36	Employment Equity & Indigenisation	Tables are provided with employee stats at all levels of the Patterson Scale...although no explicit mention is made of whether or not the Category A employees earn at or above standard minimum wage levels in each country of operation.	LC
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	p. 38	Preferential Procurement	No concerns.	OK
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	pp. 30 - 33	Employment Equity and Indigenisation	Limited concerns. A reasonable explanation of local hiring is provided, although more detail could be given regarding local management recruitment and/or promotion.	LC
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	pp. 39 - 40	Socio-Economic Development / Value Added Analysis	Limited concerns. A Value Added Statement is included, but more detail could be provided regarding the specifics of SED projects.	LC
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	N/A	N/A	Not covered.	NC

**Environmental**

Performance Indicator	Description	Reference	Section	Comments	
EN1	Materials used by weight or volume.	N/A	N/A	Not covered.	NC
EN2	Percentage of materials used that are recycled input materials.	p. 25	Climate Change, Carbon Management & Energy	Limited concerns. Co-generation of electricity from cane by-product / bagasse helps to reduce TH's demand for electricity.	LC
EN3	Direct energy consumption by primary energy source.	p. 25	Climate Change, Carbon Management & Energy	No concerns.	OK
EN4	Indirect energy consumption by primary source.	p. 25-28	Climate Change, Carbon Management & Energy	No concerns.	OK
EN5	Energy saved due to conservation and efficiency improvements.	p. 25-28	Climate Change, Carbon Management & Energy	No concerns.	OK
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	p. 25-28	Climate Change, Carbon Management & Energy	No concerns.	OK
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	pp. 27-28	Climate Change, Carbon Management & Energy	No concerns.	OK
EN8	Total water withdrawal by source.	pp. 25-28	Water	No concerns.	OK
EN9	Water sources significantly affected by withdrawal of water.	N/A	N/A	Not covered.	NC
EN10	Percentage and total volume of water recycled and reused.	p. 27	Water	No concerns.	OK
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	p. 26	Biodiversity and Land Management	Limited concerns. Although a description of land owned is provided on the whole, no detail is given with respect to land per country and/ or with respect to areas adjant to zones of significant biodiversity. This could be improved in future.	LC
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	N/A	N/A	Not covered.	NC
EN13	Habitats protected or restored.	N/A	N/A	Not covered.	NC
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	p. 28	Biodiversity and Land Management	Limited concerns. A basic statement regarding biodiversity is provided, but greater detail on a territory-by-territory basis should be included in future reports.	LC
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	N/A	N/A	Not covered.	NC

**Environmental**

Performance Indicator	Description	Reference	Section	Comments	
EN16	Total direct and indirect greenhouse gas emissions by weight.	pp. 27-28	Climate Change, Carbon Management & Energy	No concerns.	OK
EN17	Other relevant indirect greenhouse gas emissions by weight.	pp. 27-28	Climate Change, Carbon Management & Energy	No concerns.	OK
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	pp. 27-28	Climate Change, Carbon Management & Energy	Limited concerns. As stated within the report, more information will be provided as/when it become available.	LC
EN19	Emissions of ozone-depleting substances by weight.	N/A	N/A	Not covered.	NC
EN20	NOx, SOx, and other significant air emissions by type and weight.	pp. 27-28	Climate Change, Carbon Management & Energy	Limited concerns. As stated within the report, more information will be provided as/when it become available.	LC
EN21	Total water discharge by quality and destination.	N/A	N/A	Not covered.	NC
EN22	Total weight of waste by type and disposal method.	p. 28	Waste	No concerns.	OK
EN23	Total number and volume of significant spills.	N/A	N/A	Not covered.	NC
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	N/A	N/A	Not covered.	NC
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	N/A	N/A	Not covered.	NC
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	N/A	N/A	Not covered.	NC
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	N/A	N/A	Not covered.	NC
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.		GRI Index	Tongaat Hulett has not been subject to any fines or non-monetary sanctions for non-compliance with environmental laws and regulations.	OK
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	N/A	N/A	Not covered.	NC
EN30	Total environmental protection expenditures and investments by type.	N/A	N/A	Not covered.	NC

Social: Labour Practises and Decent Work

Performance Indicator	Description	Reference	Section	Comments	
LA1	Total workforce by employment type, employment contract, and region.	pp. 37, 34-36	Operations at a Glance / Employment Equity & Indigenisation	Tables are provided with employee stats at all levels of the Patterson Scale...although no explicit mention is made of whether or not the Category A employees earn at or above standard minimum wage levels in each country of operation.	LC
LA2	Total number and rate of employee turnover by age group, gender, and region.	p. 34	Employment Equity and Indigenisation	No concerns.	OK
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	N/A	N/A	Not covered.	NC
LA4	Percentage of employees covered by collective bargaining agreements.	pp. 35 - 37	Freedom of association and collective bargaining	No concerns.	OK
LA5	Minimum notice period's regarding significant operational changes, including whether it is specified in collective agreements.	N/A	N/A	Not covered.	NC
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	N/A	N/A	Not covered.	NC
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	pp. 29 - 30	Safety	No concerns.	OK
LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	pp. 30 - 31	Health	No concerns.	OK
LA9	Health and safety topics covered in formal agreements with trade unions.	N/A	N/A	Not covered.	NC
LA10	Average hours of training per year per employee by employee category.	p. 31	Talent Management and people development	Limited concerns.	LC
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	pp. 30 - 31	Talent Management & People Development	Limited concerns. More detail could be provided regarding specific programmes for talent pool identification and fast tracking to management of key personnel.	LC
LA12	Percentage of employees receiving regular performance and career development reviews.	N/A	N/A	Not covered.	NC
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	pp. 33 - 34, 53-55	Employment Equity & Indigenisation / Directorate	Tables are provided with employee stats at all levels of the Patterson Scale...although no explicit mention is made of whether or not the Category A employees earn at or above standard minimum wage levels in each country of operation.	LC
LA14	Ratio of basic salary of men to women by employee category.	pp. 33 - 34, 53-55	Employment Equity & Indigenisation	Limited concerns.	LC

Social: Human Rights

Performance Indicator	Description	Reference	Section	Comments	
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	N/A	N/A	Not covered.	NC
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	N/A	N/A	Not covered.	NC
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	N/A	N/A	Not covered.	NC
HR4	Total number of incidents of discrimination and actions taken.	pp. 35 - 36, 50	Human Rights / Code of Business Conduct and Ethics	No concerns.	OK
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	pp. 35 - 36, 50	Human Rights / Code of Business Conduct and Ethics	No concerns.	OK
HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour.	pp. 35 - 36, 50	Human Rights / Code of Business Conduct and Ethics	No concerns.	OK
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour.	pp. 35 - 36, 50	Human Rights / Code of Business Conduct and Ethics	No concerns.	OK
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	N/A	N/A	Not covered.	NC
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.		GRI Index	Tongaat Hulett has not been subject to any incidents of violations involving rights of indigenous people and actions taken.	OK

Social: Society

Performance Indicator	Description	Reference	Section	Comments	
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	N/A	N/A	Not covered.	NC
SO2	Percentage and total number of business units analyzed for risks related to corruption.	N/A	N/A	Not covered.	NC

SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	pp. 35 - 36, 50	Human Rights / Code of Business Conduct and Ethics	Although not explicitly stated in the report, the Code of Conduct covers all aspects of ensuring that corruption is avoided.	LC
SO4	Actions taken in response to incidents of corruption.	N/A	N/A	Not covered.	NC
SO5	Public policy positions and participation in public policy development and lobbying.	N/A	N/A	Not covered.	NC
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	N/A	N/A	Not covered.	NC
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes.		GRI Index	Tongaat Hulett has not been subject to any legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes.	OK
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.		GRI Index	Tongaat Hulett has not been subject to any fines or non-monetary sanctions for non-compliance with laws and regulations.	OK

#### Social: Product Responsibility

Performance Indicator	Description	Reference	Section	Comments	
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	N/A	N/A	Not covered.	NC
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.		GRI Index	Tongaat Hulett has not been subject to any incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle.	OK
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	N/A	N/A	Not covered.	NC
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.		GRI Index	Tongaat Hulett has not been subject to any incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling.	OK
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	N/A	N/A	Not covered.	NC
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	N/A	N/A	Not covered.	NC

PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.		GRI Index	Tongaat Hulett has not been subject to any incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and/or sponsorship.	OK
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.		GRI Index	Tongaat Hulett has not been subject to any complaints regarding breaches of customer privacy and losses of customer data.	OK
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.		GRI Index	Tongaat Hulett has not been subject to any fines for non-compliance with laws and regulations concerning the provision and use of products and services.	OK

### Comments

Strengths	1	The language used in the report makes it more 'readable', thereby making the report easily understandable to anyone unfamiliar with the specific activities of the company. The report made an effort to meet GRI standards.	Weaknesses	1	The product responsibility section should be included by including more information. The GRI table do not very accurate and can be largely improved. Some indicators are reported in the GRI table but not in the report.
	2	The start of the report includes a clear description of what the company does. The report includes a GRI index. However, it can be improved.		2	More information regarding community development projects should be provided, including the amount spent for each program and the outcomes value achieved. In order to make easier to find the desired information it is suggested that the report provide for each indicator the reference numbers.
	3	A map is provided to give visual support of the geographical extent of operations. Colours are used to differentiate between sections, making it easy to identify where specific discussions start and end.			
	4	The report is externally assured. Graphs are used in a way that provides a quick and easily understandable summation of performance data.			
	5	The pictures included in the report are relevant to the activities of the company, and generally support and/or enhance the discussion at that point in the report. The customers section is very detailed and provides several useful information.			
	6	Very well laid out report. It's easy to find what you are looking for. Chairman's Report is very well written, as it gives a good overview of what the organisation is about.			
	7	Graphs are used in a way that provides a quick and easily understandable summation of performance data.			
	8	The report is GRI compliant			