

Dear employees

Tongaat Hulett often makes the declaration of its focus to create value for all stakeholders through an all-inclusive approach to growth and development. It brings to this the core values of respect, honesty, integrity, consistency and a commitment to excellence.

It believes in a zero harm principle which means that we should not do business in a way that could cause harm to either people or the environment. This responsibility is shared by all of us.

We began implementing formal Safety, Health and Environment (SHE) management systems in 2003, which were guided by a SHE policy. This process has already resulted in a large decrease in the number of SHE incidents. As a business, we aim to continuously improve on these results and regularly review our SHE policy helps us to meet these objectives.

In the most recent review of our SHE policy, we created the SHE policy guideline which is designed to make the policy more easily understandable to all of our staff members.

I encourage you to read this document and apply these principles at work, at home, at play to help you lead a safe, healthy, happy life while not damaging our environment for our future generations. If you are unsure of anything mentioned in the policy, please speak to your supervisor who will be able to assist you.

Let us work together to make Tongaat Hulett a company that causes zero harm and becomes a leader in the areas of safety, health and environment, thereby helping to ensure that all of our people get home safely every day.

Peter Staude

Chief Executive Officer

11 August 2015



Safety, Health and Environment Policy Statement

Tongaat Hulett was established in 1852. Our company has the privilege of employing some 35 000 people across 6 countries in the SADC region (100 - Botswana, 100 - Namibia, 13 000 - Mozambique, 5000 - South Africa, 800 - Swaziland and 16 000 - Zimbabwe). Tongaat Hulett is one of the largest sugarcane farmers and one of the largest processors of maize in southern Africa. The company has eight sugar mills, a central refinery and four starch mills which produce a range of sugar and starch products. The conversion of our land portfolio is a key enabler of Tongaat Hulett's drive to achieve value creation for all stakeholders through an all-inclusive approach to growth and development.

Tongaat Hulett believes that to be successful, we need to care for our employees and our environment, making sure that we do not cause harm. Our employees' daily tasks in sugar, starch and land operations can be very dangerous and can result in injury, ill-health and damage to the environment. To prevent this, it is important that every employee understands and takes responsibility for their role in creating a safe, healthy and environmentally friendly workplace.

Tongaat Hulett is committed to Safety, Health and Environmental (SHE) practices that go beyond just meeting minimum legal and other requirements. With this in mind, the company has set SHE performance objectives and targets which are regularly reviewed with the aim of achieving continuous improvement. In every location and country where the company operates, it will:

Develop, implement and continually improve SHE management systems in line with internationally recognised standards, in order to do the following.

- Systematically identify, assess and manage risks to employees, contractors, affected communities and the environment.
- Follow a hierarchy of aspects and risk controls that give priority to engineering and manufacturing solutions ahead of administrative and behavioural controls, with personal protective equipment being used as the last line of defence.
- Meet, and where possible exceed, applicable legal and other requirements to which Tongaat Hulett subscribes.
- Periodically set and review objectives and targets to prevent environmental pollution or injury or ill health to people working at Tongaat Hulett operations and those in surrounding communities.

- Demonstrate leadership visibility in promoting a zero harm organisational culture and active stewardship of the environment.
- Strive to achieve international best practice thereby providing an injury free and sustainable business that creates value to all stakeholders.

Promote and maintain an open and transparent relationship with all stakeholders including employees, local communities, regulatory authorities, businesses and farmer organisations, as well as other affected and interested parties to achieve the following.

- Build relationships based on honesty, openness, mutual trust and involvement.
- Increase knowledge and enhance mutual understanding in matters of common concern.
- Share responsibility for meeting the requirements of this policy.

Seek opportunities to share successes and challenges by:

- · Communicating its SHE policy, performance and standards to all stakeholders; and
- Ensuring that where possible, surrounding communities are empowered to positively contribute towards set objectives and targets.

This SHE Policy statement should be read together with the SHE Policy Guidelines of 27 April 2015.

The policy will be reviewed periodically to reflect the company's commitment to SHE performance improvement and growing understanding of the principles of Sustainable Development.

Peter Staude

Chief Executive Officer

18 August 2015





SHE Policy Guideline

Tongaat Hulett was established in 1852 with the core values of respect, honesty, integrity, commitment and consistency. Our company has the privilege of employing about 35 000 people across 6 countries in the SADC region (100 - Botswana, 100 - Namibia, 13 000 - Mozambique, 5000 - South Africa, 800 - Swaziland and 16 000 - Zimbabwe). Tongaat Hulett is one of the largest sugarcane farmers and one of the leading processors of maize in southern Africa. The company has 8 sugar mills, a central refinery and 4 starch mills which produce a range of sugar and starch products. The conversion of our land portfolio is a key enabler of Tongaat Hulett's drive to achieve value creation for all stakeholders through an all-inclusive approach to growth and development.

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We approach SHE through key focus areas to lower the chance of incidents that could lead to harm. These include using physical protective barriers, helping to positively change people's behaviour and providing personal protective equipment (PPE). The following should be considered in setting SHE management systems, objectives and targets.

Safety

- Our Huley Rules were developed to prevent injuries and fatalities at all of our operations. By following these Huley Rules, every person helps to contribute to the safety of their fellow employees as well as the surrounding communities. For the safety of everybody, it is important that each person takes personal responsibility in ensuring that Huley Rules are followed at all times.
- As a first step towards protecting our people from injury, physical barriers are used, for example placing a fence between the walkway and roads to separate people from vehicles or by adding machine guards to protect people from being injured by moving machinery.

- Employees need to use all machinery, tools and equipment correctly when people take short-cuts or use them in ways that they are not designed to be used, they can be injured or cause injury to others. If any machinery, tools or equipment is not in good working order, it must not be used as this could also lead to injury. Any faulty machine, tool or equipment must be reported to supervisors and be repaired before it can be used again.
- At times, PPE is required to provide extra protection. The company has a responsibility to provide the correct PPE to all people at our operations, while it is their responsibility to use it correctly and keep it in a good condition.
- Every work place and its surrounding environment must be checked to make sure that it is safe before employees are allowed to begin their work, and management and employees should make sure that these workplaces remain safe.
- Our organisation's SHE culture is based on caring, helping and looking out for each other. Every employee must work safely without causing injury to themselves or others. In the same way, every person is allowed to stop anyone from doing work in a way that can cause harm to them or to other people.
- Even with all of these measures in place, injuries or near misses can occur. It is
 therefore important that everyone reports all incidents or near misses, even if the
 injury is small or it did not cause harm. The reporting of incidents allows us to
 investigate them and share our learning to help make sure that they don't happen
 again.

Health

- Tongaat Hulett understands the importance of ensuring that our people live healthy, productive lives. Our company therefore puts a lot of value in the health of our employees, their families and communities that surround our operations. The company works closely with Governments to make sure that people are able to easily receive healthcare. Most of our operations are close to Government clinics and hospitals where employees can easily be treated. At some operations where Government clinics and hospitals are not close, Tongaat Hulett is proud to work with Government to provide healthcare services to our employees and communities.
- Our communities are affected by various diseases, including AIDS, Malaria, Cholera and Tuberculosis among others. Most of these diseases can be prevented or treated. Tongaat Hulett is committed to helping employees, their families and our communities in preventing these diseases, where possible, through training and awareness campaigns and providing medicines, mosquito nets and condoms, among other things, to help prevent infection. Where possible, the company also will work with Governments and Non-Governmental Organisations to help people to easily get treatment. We encourage employees, their families and members of the community to participate in all healthcare activities.
- Eating an unhealthy diet and not getting any exercise can increase the risk of certain lifestyle diseases such as diabetes and heart disease, which could lead to death. It is important that every person takes responsibility for looking after their health by eating a healthy diet and keeping active.
- Risks in our workplace can lead to illness, either while still at work or after retirement. The company checks that employees are in good health when they become employed, during their working life and when they leave employment. Measures are taken to ensure that a person's health is not affected by the work they do or the environment they are working in. When risks have been found,

employees are provided with PPE to protect them, and they are expected to use this PPE and keep it in a good condition.

Environment

- Our business operations use natural resources, such as land and water. If we do not behave responsibly in our daily activities, we could harm the environment and negatively affect people living in it. As a responsible and caring organisation, Tongaat Hulett has objectives and plans in place to protect the environment from harm. We will not over use, damage or pollute natural resources or the environment, to protect it for our future generations. Employees and the community have an important role in protecting the environment, such as through reducing water use and not littering.
- Tongaat Hulett considers compliance with environmental laws to be a minimum requirement and aims to reach the best possible results, above what the law requires.

Our company, employees and members of the community need to play a role in and must take responsibility for meeting this SHE Policy guideline. Only then, can Tongaat Hulett reach its goal of causing zero harm to people and the environment. Employees and other interested people will be involved in regularly reviewing this Policy guideline to keep our organisation improving and reach best practice.

Peter Staude

Chief Executive Officer

18 August 2015