		Document No.	SHE 002A
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject	CONTRACTOR/SUPPLIER MANAGEMENT GUIDELINE	Page No.	Page 1 of 14

1. PURPOSE

The purpose of this guideline is to ensure that Safety, Health and Environment (SHE) requirements, rules and key performance indicators to be followed by contractors/suppliers of goods and services for Tongaat Hulett are defined, agreed to and measured against in a fair, transparent, structured, consistent and effective manner across all Tongaat Hulett operations.

2. SCOPE

This guideline should be read together with the Contractor Management Standard Document SHE 002 where applicable. The guideline applies to all Tongaat Hulett operations.

3. RESPONSIBILITY

With the support of relevant Strategic Sourcing Executives, Procurement Executives and SHE Managers, the relevant Tongaat Hulett line Executive takes the responsibility of applying this guideline.


The Corporate SHE Manager is responsible for interpreting and advising how the guideline should be applied.


4. SAFETY, HEALTH, ENVIRONMENT, QUALITY (SHEQ) & FOOD SAFETY REQUIREMENTS FOR SUPPLIERS & CONTRACTORS

The following questionnaire must be completed.

- a) Please outline how you will ensure that all materials and processes followed in manufacturing/distributing products and/or providing a service are in compliance with all applicable laws and comply with TH prescribed SHE standards. (see attached SHE policy, Supplier/Contractor SHE performance measurement criteria, Safety Hulett Rules and Terms and Conditions). Please note other SHEQ standards will be availed to relevant service providers/suppliers e.g. Contractor Management Standard Doc, SHE 002.

- b) How do you demonstrate upfront responsibility and ultimate accountability to regulatory authorities and Tongaat Hulett in the event of a SHEQ related incident arising out of supply/performance of your delivered goods, their commissioning/maintenance and/or service provided which may/may not result in harm to people or the environment?

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 Tongaathulett		Document No.	SHE 005
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE	Page No.	Page 2 of 14

c) How will you ensure that the service being provided/goods being supplied will not introduce unacceptable SHEQ risks/aspects or negatively impact on such risks in a manner that can cause harm to people or the environment?

d) Do you have any third-party certification to SHEQ/Food Safety systems e.g. ISO 14001, ISO 9001, FSSC 22000/ISO 22000, NOSA, OHSAS 18001 (being changed to ISO 45001) or a NOSA supplier/contractor vetting system compliance certificate? Please state current certification, validity and certification authority.

e) As part of the TH Sustainability, Safety, Health & Environmental commitments, TH requires its suppliers to provide some detail on their own Sustainability, Safety, Health & Environment Policies/Procedures:


❖ Do you have an active Social & Ethics Committee providing sustainability leadership? Please select the most appropriate response.


- YES
- NO
- NOT APPLICABLE

❖ Do you have a member on your Executive Team responsible for Sustainability? Please indicate position?

- YES
- NO
- NOT APPLICABLE

Position: _____

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		Document No.	SHE 005	
		Revision No.	0	
Section	SAFETY, HEALTH AND ENVIRONMENT		Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE		Page No.	Page 3 of 14

❖ Does your company have a Sustainability Strategy?

YES
 NO
 NOT APPLICABLE

❖ How does your company measure its impact on the environment? E.g. do you participate in the Carbon Disclosure Project (CDP)?

❖ Do you have standard sustainability metrics that you report on monthly to your clients as part of your contracts?

YES
 NO
 NOT APPLICABLE

❖ Do you apply technological innovation to your contracts, to ensure your clients minimise their impact on the environment? Please elaborate briefly?

YES
 NO
 NOT APPLICABLE


❖ Do you have an existing Code of Ethics / Conduct?


YES
 NO
 NOT APPLICABLE

f) Are you willing to sign our Supplier Code of Conduct? (refer to TH Supplier Code of Conduct available on the Procurement Page – copies can be issued separately upon request), failure of which you understand that you may not be eligible to do business with TH?

YES
 NO
 NOT APPLICABLE

Prepared by:
 CORPORATE SHE MANAGER



		Document No.	SHE 005	
		Revision No.	0	
Section	SAFETY, HEALTH AND ENVIRONMENT		Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE		Page No.	Page 4 of 14

❖ Has your company been recognized for its Sustainability Development (SD) efforts in the last 5 years? Please elaborate briefly?

- YES
 NO
 NOT APPLICABLE

❖ Do you have policies & procedures in place for local hiring?

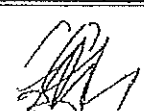
- YES
 NO
 NOT APPLICABLE


❖ Do you have compliance policies / procedures in place in the areas below? Please tick where policies & procedures exist.

- o Legal compliance
- o Employment practices
- o Human Rights (refer to Human Rights compliance questionnaire)
- o Environment
- o Anti-Bribery & Corruption
- o Transformation
- o Protection of Personal Information
- o Consumer Protection

g) As part of overall SHEQ compliance requirements and legal mandatory/agreements signed (where applicable) between TH and supplier/contractor, the supplier/contractor shall be responsible for understanding, identifying and complying with TH internal SHEQ standards, relevant Key Performance Indicators (KPIs) and applicable legal requirements based on the nature and scope of work to be done and/or product to be delivered. The contractor/supplier will therefore ensure that;

❖ The service provided in terms of the Agreement shall be carried out in conformity with all the necessary specifications and requirements prescribed by TH in respect of SHEQ standards. With regard to compliance to applicable legislation, the supplier/contractor shall ensure that compliance is maintained at all times.


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
 Tongaathulett		Document No.	SHE 005
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE	Page No.	Page 5 of 14

- ❖ In addition to relevant country specific and local legislation, all provisions of South Africa's Occupational Health & Safety Act (no85 of 1993) and Regulations, National Environmental Management Act and supporting environmental legislation and incorporated applicable Food Safety Standards, promulgated under any such Act/Standards are fully complied with.
- ❖ All and/or any current requirements of, or directives received from, any Governmental departments or bodies or Statutory Authorities charged with the administration and/or enforcement of any Acts of Parliament, Municipal or Local or Statutory Authority's Law, By- Laws regulations and/or Notices and Proclamations are fully complied with.
- ❖ The Compensation for Occupational Injuries and Diseases Act (130 of 1993) is adhered to.

h) Do you accept to participate in a SHE performance rating scheme (including safety incentive/penalty system) explained in APPENDIX A of this document, failure of which you understand that you may not be eligible to do business with TH?

YES
 NO
 NOT APPLICABLE

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 TongaatHulett		Document No.	SHE 005
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE	Page No.	Page 6 of 14

APPENDIX A: SUPPLIER/CONTRACTOR SHE PERFORMANCE RATING SCHEME

1. BACKGROUND, INTRODUCTION AND OBJECTIVES

Tongaat Hulett subscribes to the principle of ZERO HARM to people, environment and property. It is widely believed that virtually all accidents are preventable and human behaviour plays a critical role in preventing work related accidents. SHE performance by suppliers of goods and services and contractors form part of Tongaat Hulett's overall, SHE performance results and goals. It is important that supplier/contractor SHE performance, dovetails into Tongaat Hulett's SHE management systems, and that suppliers/contractors strictly adhere to set SHE rules, regulations and procedures that are applicable to all Tongaat Hulett employees. Establishment of business relationships and the sustenance of such relationships with contractors/suppliers is determined by among other key issues, their previous and current SHE performance.

It is against this background that the contractor/supplier SHE performance rating guideline outlined below was put in place and will be applied across Tongaat Hulett operations. The aim is to have a common, fair and transparent system of measuring and managing supplier/contractor SHE performance.

This scheme seeks to compliment other existing SHE initiatives within Tongaat Hulett. By rating their SHE performance, suppliers/contractors who consistently comply with SHE requirements will be given a better opportunity to participate in tenders and/or continue doing business with Tongaat Hulett. Similarly, negative consequences that could include cancelation/suspension of existing contracts, may be applied where SHE performance is found to be below tolerable levels and/or where gross violations are observed before, during or after work is undertaken.

Key objectives of this scheme include:

- Entrenching and extending the ZERO HARM philosophy and the concept of being *thy brother's keeper who is actively caring* beyond the workplace and reaching out to all stakeholders including suppliers, contractors and communities surrounding Tongaat Hulett business operations.
- Promoting fair and equal participation, safe behaviour modelling and holding everyone responsible and accountable for SHE including employees, suppliers and contractors.
- Ensuring fair and transparent supplier/contractor SHE performance measurement and consequence management.


2. SCOPE OF SHE PERFORMANCE RATING SYSTEM

Subject to practicality and relevance as determined by responsible persons from Strategic Sourcing, Procurement, operations line management in consultation with the Corporate SHE Manager and operations SHE Managers, all suppliers/contractors should be measured against specific SHE Key Performance Indicators that should be aligned with (but not necessarily limited) to the following guidelines:

- 2.1 A new supplier/contractor will be allocated a maximum of 100 SHE credit points, at the beginning of every year or first contract, which ever comes earlier.
- 2.2 A supplier/contractor experiencing serious incidents or not complying with defined SHE requirements, will have points deducted from their initial or current balance of points based on the guideline below.

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CORPORATE SHE MANAGER





		Document No.	SHE 005
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE	Page No.	Page 7 of 14

- 2.3 A supplier/contractor reaching zero/negative points will have all current contracts immediately suspended and would be automatically subjected to a SHE performance review by a team involving representatives from Strategic Sourcing (for TH wide services), Procurement (for operations/business unit specific services), operations line management and the Corporate SHE Manager (for TH wide services) and operations SHE Managers (for operations/business unit specific services). The team will determine the sanction to be applied being guided and aligned with TH operations specific codes of conduct and service level agreements e.g. a sanction that would be applied to a TH employee should be equally applied to a supplier/contractor employee for the same violation. The general guideline is that upon reaching zero credit points, service agreement should be terminated, and new contracts will not be issued at least within the same year and for the period to be determined by the review team. Where it is not practical to immediately suspend/terminate contract without significantly disrupting business operations e.g. longstanding cane haulage/logistics contracts, the lagging indicator penalty system stipulated below will be applied in the intervening period.
- 2.4 The previous year's balance of points (credit) will be used to rate and determine a supplier/contractor's suitability for new contracts in the following year.
- 2.5 A supplier/contract with more than one contract running concurrently under their responsibility will be measured against each contract i.e. credit points from one contract cannot be applied on another contract within the same operation or at other Tongaat Hulett operations, unless certification is lost, there is a fatality in any of contracted areas or noncompliance to any legislative requirement.
- 2.6 The rating process is credit point based i.e. a supplier/contractor with high/ more credit points will score higher points/weightings at tender stage and would have better chances to secure a contract ahead of other suppliers/contractors with less points.
- 2.7 Only suppliers/contractors who remain credit worthy on points will be considered for any current and subsequent years during contracts adjudication and awarding processes across all TH operations.
- 2.8 Suppliers/contractors meeting the above and other set criteria will qualify to participate in any other SHE incentives, competitions and awards implemented as part of operation specific SHE incentive/penalty systems from time to time.

3. CREDIT POINT RATING CRITERIA

The performance credit point rating criteria guideline will be applicable to contractors doing work for Tongaat Hulett and may not be applicable to suppliers of goods. Applicability will therefore be determined and communicated by respective SHE Managers and Strategic Sourcing/Procurement Executives/Line Executives at the time of signing the contract. The Credit Point Rating Criteria is based on critical lagging and leading indicators as shown in the table below. Allocation of credit points and determination of points to be deducted may vary from one contract to another and they shall be determined by the operations executive in consultation with the SHE Manager/Strategic Sourcing Executive/Procurement Executive.


Prepared by: CORPORATE SHE MANAGER	
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		Document No.	SHE 005	
		Revision No.	0	
Section	SAFETY, HEALTH AND ENVIRONMENT		Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE		Page No.	Page 8 of 14

Item No.	Key Performance Indicator	Points Allocated	Points Deducted
3.1	Initial points allocation (At start of year/contract)	100	
3.2	Loss of prescribed third-party certification e.g. NOSA, ISO 45 001/OHSAS 18001 etc.		100
3.3	Fatality (per incident)		100
3.4	Lost Time Injury/Level 3/2 environmental incident/irreversible occ health case (per incident) – where investigation team find contractor to be accountable and recommend a penalty.		50
3.5	Failure to report an incident e.g. MTC, FAC, near miss (per incident)/minor environmental incident (level 1)/reversible occ health case -- where investigation team find contractor to be accountable and recommend a penalty.		10
3.6	Visible Felt Leadership compliance e.g. performing planned task observations, holding SHE committee meetings, participating in audits < 100% (per site targets per calendar month)		10
3.7	Employee observations compliance e.g. SHE representative inspections, BBS observations etc. < 100% (per calendar Month)		10
3.8	Using unsafe equipment (per incident)		Max 50
3.9	Failure to comply with prescribed SHE golden rules and/or legal requirements e.g. Huley Rules, Corporate standards, legal appointments/reporting requirements etc. (per incident)		75
3.10	Violation of general SHE rules and procedures (per incident)		Max 50
3.11	Ongoing individual at risk behaviour or at-risk work condition issues		Max 50

4. LAGGING INDICATORS - FATALITY, LTIFR / LTI INCENTIVES AND PENALTIES

- 4.1 Lagging indicators will be applied mainly to contractors working on Tongaat Hulett sites particularly longstanding contractors with long term contracts e.g. cane haulage, scaffolding, forklift contractors etc.
- 4.2 Incentives/penalties must be consistent with operation specific limits/ incentives/penalties as per above. These must be agreed to and included in the contract/SLA at the time of signing.
- 4.3 There will be a 3% penalty and no safety incentive for all operations and contractors with a fatality.
- 4.4 The level of incentive/ penalty may vary from one contract to another and will be determined by operations executive in consultation with SHE Manager/Procurement Executive/Strategic Sourcing Executive.


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 Tongaathulett		Document No.	SME 005
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject		SUPPLIER MANAGEMENT GUIDELINE	Page No.

	Actual 2017/18	Incentives/ Penalties Going Forward		
		3% Incentive if below	No Incentive or Penalty if actual within the range	3% Penalty if above
TH Consolidated	0.083	0.085	0.085 – 0.090	0.090
TH Developments	0 LTI	1 LTI	1 LTI	1 LTI
Zimbabwe	0.028	0.045	0.045 – 0.085	0.085
Mozambique	0.018	0.045	0.045 – 0.085	0.085
Sugar (SA) excl Voermol	0.353	0.230	0.230 – 0.240	0.240
Voermol	1 LTIs	1 LTI	1 LTI	1 LTI
Starch	5 LTIs	4 LTIs	4 – 5 LTIs	5 LTIs
Swaziland	3 LTIs	2 LTIs	2 LTIs	2 LTIs
Botswana	0 LTI	1 LTIs	1 LTIs	1 LTIs
Namibia	0 LTI	1 LTIs	1 LTIs	1 LTIs
Contractor/Supplier 1	N/A	To be determined by operations	To be determined by operations (TBD)	To be determined by operations
Contractor/Supplier 2	N/A	TBD	TBD	TBD
Contractor/Supplier 3	N/A	TBD	TBD	TBD

5. DATE OF COMMENCEMENT

Actual date of commencement will be confirmed by operations executives and communicated by way of tender documents/service level agreements/contracts. The intention is to implement it not later than 31 December 2018. It will be reviewed whenever deemed necessary.

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		Document No.	SHE 005	
		Revision No.	0	
Section	SAFETY, HEALTH AND ENVIRONMENT		Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE		Page No.	Page 12 of 14

APPENDIX C: SAFETY HULEY RULES
SAFETY FUNDAMENTALS

TH's safety management is founded on "zero tolerance" – an approach to safety that requires an absolute adherence to standards at all times and an intolerance of unsafe acts or conditions. THS, therefore, expects centres to be fully accountable for communicating, training and implementing safety procedures based on these Rules. Performance under these rules will be audited to ensure compliance. The accompanying Huley Rules will be strictly enforced by all operations to ensure the safety of our employees and contractor, and to safeguard the community.

The following fundamentals are embedded in each of these rules:

Safe systems of work and the provision of timely, appropriate safety and health information underpin all activities.

- ❖ Hazards are identified, and risks assessed before activities commence
- ❖ Hazards and risks are reviewed whenever processes, people or natural circumstances change
- ❖ All persons are *trained, authorized and fit* to perform their duties
- ❖ Personal protective equipment (PPE) is worn as defined by risk assessment and minimum site requirements
- ❖ Emergency response plans, developed from a review of potential emergency scenarios, are in place before commencement of work

HULEY RULE 1: CONFINED SPACES


A confined space is defined as an enclosed or partially enclosed space that is at atmospheric pressure during occupancy and is not intended or designed primarily as a place of work, which could have restricted means for entry and exit, and which may at any time:


- *Have an atmosphere which contains potentially harmful levels of contaminant*
- *Have an oxygen deficiency or excess, or*
- *Cause engulfment*

Operations must assess the risks associated with confined spaces and have in place procedures to prevent unauthorised entry, so that no one enters such a space unless:

- All other options have been ruled out
- A permit is issued with authorization by a responsible person(s)
- The permit is communicated to all affected personnel and posted, as required
- All persons involved are competent to do the work and are using PPE
- All sources of energy affecting the space have been isolated and locked out
- All lighting and ventilation equipment required to work safely in the confined space shall have the necessary protection and "fit for use"
- Testing of atmospheres is conducted, verified and repeated as often as defined by the risk assessment and permit to work
- Emergency response arrangements are in place in accordance with the permit to work

In every situation before, during and after an activity is undertaken, the following guideline key questions/principle must be asked/adhered to:

Prepared by: CORPORATE SHE MANAGER	
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 Tongaathulett		Document No.	SHE 005	
		Revision No.	0	
Section	SAFETY, HEALTH AND ENVIRONMENT		Effective Date	01/12/2018
Subject	SUPPLIER MANAGEMENT GUIDELINE		Page No.	Page 14 of 14


- Drivers and operators are certified, authorized, and fit to operate the class of vehicle
- The number of passengers does not exceed the design specification for a given vehicle
- Seat belts are installed where appropriate and will be worn
- The driver does not use a hand-held cell phone while driving
- Persons and unsecured material and equipment are not being transported together in the same compartment
- Passengers are not transported in any vehicle that is not designed for the specific purpose
- Where practical, vehicles must be fitted with Roll Over Protection Systems (ROPS)


HULEY RULE 5: LIFTING & MATERIAL HANDLING

Operations must assess the risks associated with material handling utilizing cranes, hoists or other mechanical lifting devices, including manual handling.

Each operation must develop safety procedures that reflect due consideration of its own particular risks and require at least that these activities will not commence unless:

- An assessment of the task has been completed and the method and equipment have been determined by an appropriately trained and authorized person(s)
- Operators of powered lifting devices are trained and authorized
- Rigging of the load is carried out by a trained and authorized person(s)
- Lifting devices and equipment have been certified for use as per legal requirements
- The load does not exceed dynamic and/or static capacities of the lifting equipment
- Any safety devices installed on lifting equipment are operational and are tested at least annually
- Suitable tools, PPE and procedures are in place, particularly for manual material handling

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		Document No.	SHE 005
		Revision No.	0
Section	SAFETY, HEALTH AND ENVIRONMENT	Effective Date	01/12/2018
Subject		Page No.	Page 13 of 14
		SUPPLIER MANAGEMENT GUIDELINE	

- *Has anything changed?*
- *Are you trained and authorized to perform this work?*
- *Zero tolerance means stopping work that is unsafe*

HULEY RULE 2: WORKING AT HEIGHTS

Operations must assess risks associated with working at heights or over openings.

Each Operation must have in place safety procedures covering situations where there is a risk of falling 2 metres or more, that reflect due consideration of its own particular risks and require at least that work does not proceed unless:

- Powered mobile platforms be designed to be failsafe in the event of an electrical or hydraulic failure
- Platforms or scaffolding where erected, must be erected, inspected and certified by a competent person
- Fall-arrest equipment is worn that will limit free fall to ensure the safety of persons
- All equipment is subject to regular inspection and all defective or damaged equipment is immediately taken out of service
- Person(s) are appropriately trained and authorized to perform work at heights
- The use of portable ladders is governed by site specific procedures and included in general workforce education and training

HULEY RULE 3: ENERGY & MACHINERY ISOLATION

Operations must assess risks associated with isolation of and working on energy systems, particular risks and require at least that such work does not proceed unless:


- The methods of isolation and discharge of stored energy are agreed and executed by a trained and authorized person(s)
- Any stored energy is discharged or is managed by an agreed lockout procedure
- A lock-out procedure incorporating locking devices and personal tags is utilized at isolation points
- A test is conducted by a competent person(s) to ensure that the isolation is effective
- Isolation effectiveness is periodically monitored, rectified if necessary and recorded by a competent person
- All machine guards and safety systems are re-established upon completion of work
- A risk assessment is conducted, and appropriate safety measures are in place where it is necessary for work to be carried out on live systems

HULEY RULE 4: VEHICLE SAFETY

Operations must assess risks associated with the use of vehicles in all activities.

Each operation must have in place safety procedures that reflect due consideration of its own particular risks and require at least that vehicles are not operated unless:

- There is an appropriate service and check procedure in place and the vehicle is confirmed to be in safe working order

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TongaatHulett®

OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENT (HSE) POLICY

Tongaat Hulett is a leading agricultural and agro-processing business, with integrated components of land management and property development. Established in 1852, it is one of the largest sugar producers in Africa and a large processor of maize in Southern Africa. The company has sugar mills, sugar refineries and starch mills that produce a range of sugar and starch products for the regional and international markets. At the peak of its agricultural season, Tongaat Hulett employs over 30 000 employees at several operations in the Southern Africa Development Community.

At Tongaat Hulett, we strongly believe in providing a safe and healthy working environment for our employees, contractors and people doing business with us whilst at the same time protecting the environment from harm arising out of our operational activities. HSE is a component of sustainable development and a critical prerequisite to the improvement of our sustainable business practices.

At every operation and in all countries, that we operate, we are committed to;

- ❖ **Develop, implement and improve HSE management systems and practices that exceed local legal requirements and conform with other requirements, to:**
 - identify, assess, eliminate and/or control environmental aspects and Safety and Health hazards to employees, contractors and any other affected parties;
 - ensure a safe and healthy work environment to prevent injury and ill-health to workers and other parties exposed to HSE risks arising from our operational activities, facilities, products and services;
 - protect the environment and prevent environmental pollution throughout the business operation's value chain;
 - apply the hierarchy of HSE 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;
 - demonstrate visible leadership in promoting an organizational culture of Zero Harm
 - and set HSE objectives and targets, regularly review them and communicate these to our internal and external stakeholders.

- ❖ **Promote and maintain an open and transparent relationship with all interested parties including workers, local communities, regulatory authorities, business and farmer organizations, to achieve the following:**
 - To be the most trusted partner in all that we do.
 - Protection of employees' right of refusal to work in unsafe conditions.
 - Increase our knowledge and mutual understanding of HSE matters of concern.

❖ **Seek opportunities to share successes and challenges and demonstrating that we succeed through our people and teamwork by:**

- enabling effective worker consultation and participation on HSE matters;
- communicating the HSE policy, compliance obligations and performance internally and making this information accessible to interested external parties and
- sharing responsibilities to meet requirements of this policy.

This HSE Policy is binding on all Tongaat Hulett operations, employees, contractors, agents, suppliers and service providers doing business with us. It will be periodically reviewed to reflect the company's commitment to continual improvement of the HSE management system and other Sustainability practices.



Gavin Hudson
Chief Executive Officer
27 August 2019