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TongaatHulett®

RESPONSIBLE LAND USE POLICY



We succeed
through
excellence and
innovation



We grow and
win in teams



We take
accountability



Integrity and
ethics guide
our way



We care and do
our best



Safely home
every day

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1. Introduction

- 1.1. Tongaat Hulett Limited (“TH” or “the Company”) views spatial planning and environmental management as critical components of its commitment to corporate social responsibility.
- 1.2. Our responsible land use policy is owned and endorsed by the Social & Ethics Committee of the Board of Directors.
- 1.3. Responsibility for implementing this policy resides with every TH employee, where management of the policy is the responsibility of the Agriculture and Developments departments.
- 1.4. Access to land for human settlements, rural growth, economic development and the righting of historical wrongs with respect to land claims is a sensitive issue within the countries where TH operates.
- 1.5. We acknowledge our responsibility to manage the land we own, lease, and/or cultivate in partnership with third party cane growing suppliers in an economically, environmentally and socially sustainable way, while combatting a unique set of agricultural productivity challenges.
- 1.6. Our cropping, livestock and agri-processing practices all have a direct and indirect impacts on ecosystems, natural landscapes and biodiversity while our businesses and local communities rely on oft-fragile ecosystems for the provision of water, climate regulation and food production.
- 1.7. We comply with all applicable laws and are guided by relevant internationally recognised principles. In the agricultural landscapes where we operate, we aim to optimise yields while maintaining important biodiversity and ecosystem processes to continuously improve the resilience of our agricultural activities, as well as the land and water sources surrounding our operations.
- 1.8. We believe that it is our responsibility to work with key stakeholders to identify sustainable solutions for mitigating short, medium and long-term land use risks.

2. Purpose

- 2.1. The purpose of this policy is to ensure that company impacts on land use are fair to the communities in which we operate, the farmers with whom we partner, and all other stakeholders with whom we engage.

3. Objective

- 3.1. With regard to our agricultural management practices, we will:

- 3.1.1. Meet the requirements of all relevant local, national and regional laws, as well as all relevant international treaties and agreements.
- 3.1.2. Act in accordance with internationally declared principles and standards, including but not limited to the United Nations (UN) Sustainable Development Goals (SDGs) and the ten principles of the UN Global Compact.
- 3.1.3. Promote sustainable land management, inclusive of the protection of areas of significant ecological and/or biodiversity value.
- 3.1.4. Promote sustainable water management and conservation, including abstraction, holdings, treatment and discharge.
- 3.1.5. Continually strive for increasing cropping and livestock throughput harvested per hectare of land using latest technologies and practices supported by sound research and science.
- 3.1.6. Understand, assess and actively manage the impacts of our agricultural and agriprocessing operations on the people and landscapes in which they are located through proactive stakeholder engagement.
- 3.1.7. Recognise, respect and protect the customary, traditional, spiritual and civil rights and laws of indigenous peoples and local communities, and actively engage with these groups to ensure we take their views into account.
- 3.1.8. Engage with our stakeholders to ensure that they are aware of the commitments the company has made to identify, prioritise and mitigate the most material land use risks the company faces, as well as to provide a mechanism through which their concerns have to be raised, discussed and addressed.
- 3.1.9. Publicly disclose information on our agricultural and agriprocessing management performance through annual sustainability reporting.
- 3.1.10. Ensure that employees, contractors and suppliers are aware of their shared responsibility in helping the company meet its responsible land use goals.

4. Scope

- 4.1. This policy applies to all of the company's operations.

5. Regulatory Framework

- 5.1. This policy is drafted in accordance with Tongaat Hulett policies, procedures and best practice to ensure compliance with relevant legislation. If local laws or

regulations establish stricter requirements, we will comply with such stricter requirements.

6. Management of Land Use

- 6.1. Because TH understands that agricultural operations are part of a wider landscape that requires sustainable stewardship of land and freshwater ecosystems, inclusive of our growing partners, we will:
 - 6.1.1. Develop and implement Biodiversity Action Plans for all of our agricultural operations, ensuring that input from relevant stakeholders is sought, duly considered and incorporated into the plans wherever said input is deemed appropriate.
 - 6.1.2. Identify and appropriately manage sites of significant ecological, cultural, historical and/or geological importance, inclusive of World Heritage areas and International Union for Conservation of Nature (IUCN) Category I-IV protected areas or in UN Protected Sites in line with the UN Convention on Biological Diversity.
 - 6.1.3. Identify and protect threatened and endangered species, including those listed in the IUCN Red List of Threatened Species.
 - 6.1.4. Proactively identify High Conservation Value (HCV) areas, connecting corridors and other areas of conservation significance within and beyond our borders and strive to maintain or enhance the critical environmental and social values of these ecosystems.
 - 6.1.5. Promote, support and invest in technological research and development in ecosystems for improved management of water, soil, biodiversity and ecosystems.

7. Non-compliance

- 7.1. Non-compliance with this policy and the procedures associated with it may result in disciplinary action and where appropriate, dismissal.

8. Communication of Policy

- 8.1. In order for the policy to be sustainable, it must be supported by a structured education, communication and awareness programme.
- 8.2. This policy is to be communicated to all employees through awareness campaigns and/or specialised training for those employees who are directly responsible for assisting in the monitoring, measurement and reporting of land use impacts.
- 8.3. This policy will be made available to all stakeholders via the Sustainability portal on the company's website (www.tongaat.com).

9. Administration

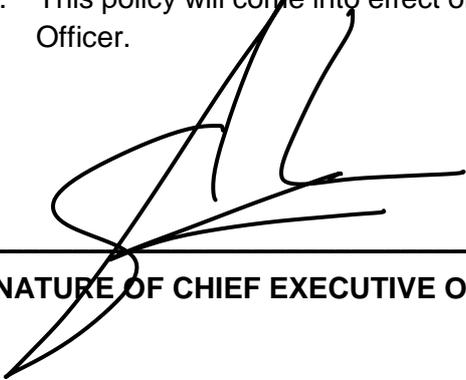
- 9.1. Tongaat Hulett has the overall responsibility for the maintenance and operation of this policy.
- 9.2. The Sustainability office based at the Corporate office will be responsible for ensuring administration of this policy.

10. Policy Review

- 10.1. This policy shall be reviewed annually and as and when required to factor in any changes in legal frameworks, organisational development and economic trends.

11. Implementation date

- 11.1. This policy will come into effect on the date of signature by the Chief Executive Officer.



SIGNATURE OF CHIEF EXECUTIVE OFFICER

7/12/20

DATE

RESPONSIBLE LAND USE POLICY

DOCUMENT CONTROL DATA

VERSION 1

LAST REVISION DATE: 24/10/2020

FIRST IMPLEMENTATION DATE: 04/12/2020

DOC. REF. NR. THL17/2020

APPROVAL RECORD

	DESIGNATION	SIGNATURE	DATE
AUTHOR	Business Assurance Executive		24/10/2020
REVIEWED BY	Group Company Secretary		16/11/2020
APPROVED BY	Board of Directors	Resolution: 2020/042	30/11/2020