



Illovo Sugar South Africa Human Rights Policy

May 2025

Introduction

At Illovo Sugar South Africa (ISSA) we care about the people in all our businesses' operations, in the supply chains we rely on, and in communities affected by what we do. We are committed to respecting all internationally recognised human rights.

Illovo Sugar South Africa understands the benefits of implementing the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs). In doing so, we are guided by the OECD Guidelines for Multinational Enterprises (OECD Guidelines), the OECD Due Diligence Guidance for Responsible Business Conduct (OECD Due Diligence Guidance), the Universal Declaration of Human Rights, the International Labour Organization's (ILO) Decent Work Agenda, and the ILO Declaration on Fundamental Principles and Rights at Work.

Our Human Rights principles and scope

As a key player in South Africa's sugar industry with suppliers and representatives across the globe, we recognize the important role we play in respecting human rights and, at a minimum, will always comply with relevant national and international legal frameworks.

For Illovo Sugar South Africa the scope of this policy includes:

- those who work for all our businesses' operations,
- those in their respective supply chains, and
- those who live in communities affected by what we do.

Our approach is underpinned by the Sustainable Development Goal 8, Decent Work and Economic Growth. We will be using the ILO decent work guidance on the agri-food sector¹.

The scope of rights of this policy is embodied in the ABF Supplier Code of Conduct²

Our Governance

- The Managing Director is accountable for implementing this Human Right Due Diligence (HRDD) Framework and managing risk. He will also review it periodically or as significant changes occur.
- The policy will be evaluated and reviewed each year by the ISSA Exco during their September monthly Exco meeting.
- The Managing Director is responsible for the implementation of due diligence in accordance with the HRDD Framework, the Human Rights principles, and requirements set by this Illovo Sugar South Africa policy.

¹ [Draft policy guidelines for the promotion of decent work in the agri-food sector](#)

² [ABF-Supplier-Code-of-Conduct-Policy.pdf](#)

- We require all our employees, directors, functional heads and officers to adhere to this policy at all times. Our suppliers and representatives are expected to act in accordance with our Supplier Code of Conduct.

Our Approach - Human Rights Due Diligence Process³

We adopt a risk-based approach to due diligence, and accordingly, our management systems are designed to identify, assess, and manage the key human rights risks and impacts based on the operational context, our leverage, and our business relationships.

Guided by OECD Due Diligence Guidance⁴, we use a HRDD Framework to guide the implementation of this policy. This HRDD Framework is built upon the OECD Guidelines' 6-stage due diligence approach.

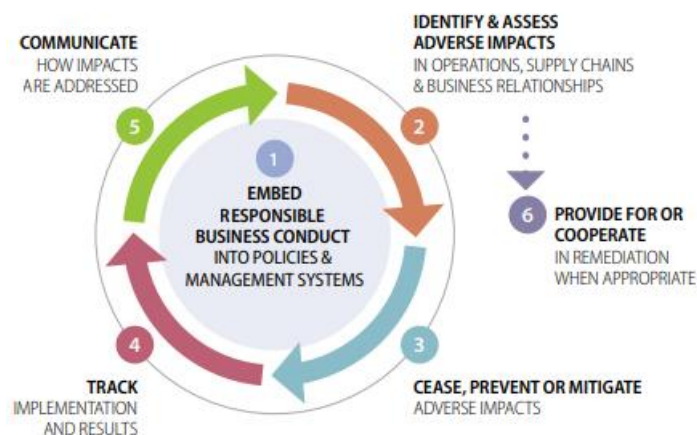


Figure 1: OECD Due Diligence Approach

Stakeholder Engagement

In alignment with the UNGPs and OECD Guidelines, we consider stakeholder engagement a key part of our HRDD. Illovo Sugar South Africa has been and will continue consulting with key stakeholders to assess, mitigate, and monitor risks. We engage with workers, workers' organisations, communities, and other relevant stakeholders to ensure that their perspectives are considered.

In addition, we are taking the opportunity to work with relevant external stakeholders to support the training and awareness building of our growers and contractors across our footprint.

Grievance mechanism and remediation

All employees and supply chain workers are encouraged to use our confidential, independent 'SpeakUp' system, which includes a hotline and online system for all labour rights-related issues in the workplace and

³ Based on Business and Human Rights: [Human Rights Due Diligence & Impact Assessment - Business & Human Rights Resource Centre \(business-humanrights.org\)](https://www.business-humanrights.org/en/human-rights-due-diligence) as well as ETI Human Rights Due Diligence Framework: [eti_human_rights_due_diligence_framework.pdf \(ethicaltrade.org\)](https://www.ethicaltrade.org/eti-human-rights-due-diligence-framework.pdf)

⁴ [OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf](https://www.oecd.org/due-diligence-guidance-for-responsible-business-conduct.pdf)

supply chain. The ‘*Speakup*’ system provides a foundation for Illovo Sugar South Africa to help employees and supply chain workers raise any concerns about Human Rights abuses.

We communicate this system in various ways, both internally and externally, to increase its visibility and accessibility so that everyone in our operations and supply chain is aware of where they can go to raise issues and, more importantly, receive confidential advice and meaningful support.

Transparency

Supply chain transparency is an important part of Illovo Sugar South Africa’s business and informs decision-making. We work with stakeholders across our supply chain and seek to ensure traceability, quality, and reliability, and we require our partners to adhere to strict social, environmental, and ethical standards.

Contact Us

Do not hesitate to contact us with any questions or concerns about this Illovo Sugar South Africa Human Rights policy. Please contact Lindiwe Khuzwayo: Lkhuzwayo@illovo.co.za



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