

HUMAN RIGHTS POLICY ISM

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 Human Rights Policy

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Table of Contents

1. Introduction	3
2. Our Human Rights principles and scope	3
3. Our Governance	3
4. Our Approach - Human Rights Due Diligence Process	3
5. Stakeholder Engagement	4
6. Grievance mechanism and remediation	4
7. Contact Us	5

1. Introduction

At Illovo Sugar Malawi we care about the people in all our operations, in the supply chains we rely on, and in communities affected by what we do.

Illovo Sugar Malawi 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.

2. Our Human Rights principles and scope

For Illovo Sugar Malawi, 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.

3. Our Governance

- The board and managing director are accountable for implementing this Human Rights Policy and managing risk. They will also review it periodically or as significant changes occur.
- The policy will be evaluated and reviewed each year.
- The board and managing director are responsible for the implementation of due diligence in accordance with our HRDD Framework, our Human Rights principles, and requirements set by this Illovo Sugar Malawi policy.
- We require all of our employees, directors, 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 Conduct².

4. 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.

In accordance with OECD Due Diligence Guidance⁴, Illovo Sugar Malawi will 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.

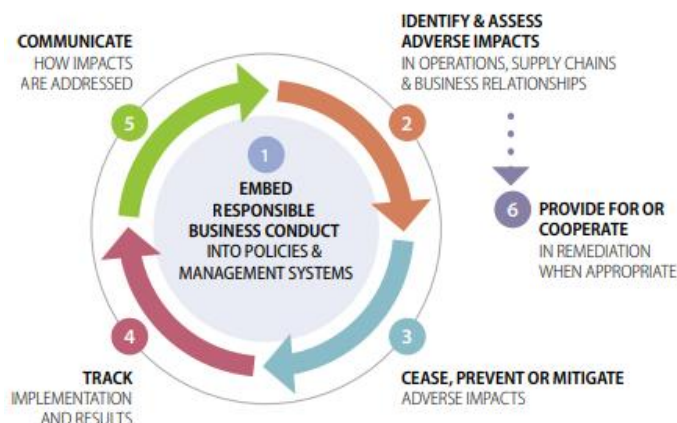


Figure 1: OECD Due Diligence Approach

5. Stakeholder Engagement

In alignment with the UNGPs and OECD Guidelines, we consider stakeholder engagement a key part of our HRDD. Illovo Sugar Malawi has been and will continue consulting with key stakeholders as a fundamental part of our approach to Human Rights Due Diligence. For example, we engage with workers, organizations, communities, and other relevant stakeholders to ensure their perspectives are considered.

6. Grievance mechanism and remediation

Illovo Sugar Malawi has grievance mechanisms for its workforce and requires the same from its supply chain suppliers and stakeholder communities.

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

In addition, for those situations where these grievance mechanisms do not work, we encourage the use of our confidential, independent '**SpeakUp**' system, which includes a hotline and online system for all labour rights-related issues in the workplace and supply chain. The '**Speakup**' system provides a foundation for Illovo Sugar Malawi to help employees and supply chain workers raise any concerns about Human Rights abuses.

7. Contact Us

Please do not hesitate to contact us with any questions or concerns regarding this Illovo Sugar Malawi Human Rights policy.