

Global Reporting Initiative (GRI) G3 Content Assessment Template

STANDARD DISCLOSURES PART I : Profile Disclosures

NI = Needs Improvement; NR - Not Required; NC = Not Covered; NA = Not Applicable (AR) = Inside Annual Report (SR) = Inside Sustainability Report

Strategy and Analysis

Profile Disclosure	Description	Reference	Section	Comments	C	B	A
1.1	Statement from the most senior decision-maker	pp. 6 - 29	Chairman's Statement,	Chief Executive's Reviewt, of the organization	NI	NI	NI
1.2	Description of key impacts, risks, and opportunities.	pp. 2 - 4	Introduction to Tongaat Hulett, Capitalising on Tongaat Hulett's Strategic Performance	Some information is offered about future focus areas and "focus areas of sustainability", but this appears to be a very cursory discussion. It mentions 'topic areas' (e.g., "safety") rather than specific issues (e.g., management of lost time injury frequency and/or fatal injury frequency rates), and does not offer a fully meaningful "description of key impacts, risks and opportunities" as per the indicator's requirements.	NR	NI	NI

2. Organisational Profile

Profile Disclosure	Description	Reference	Section	Comments	C	B	A
2.1	Name of the organization.	Throughout	Throughout	No concern.	OK	OK	OK
2.2	Primary brands, products, and/or services.	pp. 2 - 3	Introduction to Tongaat Hulett	The first paragraph of the Overview section provides a very high level mention of TH's business, without specifically mentioning what the company's "primary brands, products and/or services" are. One might assume that this is included in the body of the Annual Report, but if not, it should be.	NI	NI	NI
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	p. 31	Sustainability Report	Operational structure information on the website is referred to within the report.	OK	OK	OK
2.4	Location of organization's headquarters.	p. 45	Feedback	Although not explicitly stated, one must assume that the address given on p.16 is for TH's headquarters.	NI	NI	NI
2.5	I	pp. 18 - 23	Chief Executive's Review	No concerns.	OK	OK	OK
2.6	Nature of ownership and legal form.	p. 32	Reporting Boundaries	The listed nature of the company is mentioned in the Reporting Boundaries section of the report. Improvements could be made in future reports by providing a more comprehensive discussion about the nature of ownership in the section defining who Tongaat is, and what the company is about.	OK	OK	OK

2. Organisational Profile							
Profile Disclosure	Description	Reference	Section	Comments	C	B	A
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	pp. 25 - 26, 32	Chief Executive's Review, Reporting Boundaries	Geographic structure is discussed in the 'Reporting Boundaries' section, including a specific reference to online information.	OK	OK	OK
2.8	Scale of the reporting organization.	p. 44	Value Added Analysis	No concerns.	OK	OK	OK
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	pp. 6 - 7	Chairman's Statement	Significant changes in size and ownership are discussed in the Chief Executive's Review, particularly with respect to the sale of Anglo's share in the company.	OK	OK	OK
2.10	Awards received in the reporting period.	p. 32	External Recognition	No concern. Adequate information is supplied.	OK	OK	OK
3. Report Parameters							
Profile Disclosure	Description	Reference	Section	Comments	C	B	A
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Throughout	Throughout	No concern.			
3.2	Date of most recent previous report (if any).	p. 31	Sustainability Report	Mention of the fact that last year's report - prior to the 15-month transition reporting period - is made in the 'Reporting Boundaries' section of the report.	OK	OK	OK
3.3	Reporting cycle (annual, biennial, etc.)	Throughout	Throughout	No concern.	OK	OK	OK
3.4	Contact point for questions regarding the report or its contents.	p.16	Feedback	No concern...although it would be good to give a specific name.	OK	OK	OK
3.5	Process for defining report content.	p. 31	Overview	The scope of the report is covered in the 'Overview' section.	OK	OK	OK
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	p. 32	Reporting Boundaries	Could be improved. Although mention is made of the territories under review, no other mention of any form of boundary is provided...including such things as whether or not the report covers ALL indicators for ALL operations.	NI	NI	NI
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope). I	pp. 31 - 32	Overview, Reporting Boundaries	Aside from mention of the fact that this is the first report adhering to the application levels of the GRI's G3 Guidelines, no specific mention of any limitations have been discussed.	NI	NI	NI
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	p. 31	Overview	The 'Overview' section of the report clearly explains that the report covers the full range of operations in Tongaat's 6 geographical territories.	OK	OK	OK
3. Report Parameters							
Profile Disclosure	Description	Reference	Section	Comments	C	B	A
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Throughout	Throughout	Basic/cursory mentions of data measurement techniques are provided throughout the report, in the relevant sections. However, further discourse could be provided in future reports, to offer the reader a more comprehensive understanding of how performance is measured and monitored, including how frequently monitoring occurs.	NR	NI	NI

3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	p. 108	Five Year Review	No concerns.	OK	OK	OK
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Throughout	Throughout	Mention is made of changes throughout the report, where applicable, including such things as the change in the reporting period and the addition of emissions data for the first time.	OK	OK	OK
3.12	Table identifying the location of the Standard Disclosures in the report.	p. 45	GRI Index	Although not included in the Annual Report, this GRI Index Table is explicitly mentioned as being available via the internet.	OK	OK	OK
3.13	Policy and current practice with regard to seeking external assurance for the report.	p. 45	Independent Assurance Statement	Aside from mentioning that assurance is being provided, no attempt is made to explain why TH has sought assurance and/or what the company's policy might be for gaining such assurance.	NR	NI	NI
4. Governance, Commitments, and Engagement							
Profile Disclosure	Description	Reference	Section	Comments			
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	pp. 46 - 50	Corporate Governance	The governance structure of Tongaat Hulett, including committees under the highest governance body responsible for specific tasks, is discussed within the 'Corporate Governance Report' section of the report.	OK	OK	OK
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	p. 46	Board of Directors	Explicit mention of the independent Non-Executive Chairman, J B Magwaza, is made in the 'Corporate Governance Report' section.	OK	OK	OK
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	p. 46	Board of Directors	Explicit mention of the eleven non-executive and three executive directors is made in the 'Corporate Governance Report' section.	OK	OK	OK
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	p. 40	Stakeholder Engagement	Although weak in some aspects, including frequency and specific methodology of engagement approach, the 'Stakeholder Engagement' section explains how employees and shareholder are afforded an opportunity to inform strategy.	NI	NI	NI
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	pp. 51 - 52	Remuneration Report	The Annual Executive Bonus scheme is discussed in the 'Corporate Governance Report'.	NR	OK	OK
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	p. 51	Code of Ethics	Conflicts of interest are discussed in the Code of Ethics section of the Corporate Governance Report.	NR	OK	OK
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	p. 49	Nomination Committee	The role of the Nomination Committee is discussed within the Corporate Governance Report.	NR	NI	NI

4. Governance, Commitments, and Engagement

Profile Disclosure	Description	Description	Section	Comments			
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	p. 4	Capitalising on Tongaat Hulett's Strategic Platform	Overall 'Strategic Platform' rather than vision / mission is discussed within the report, as well as mentions made of principles relevant to economic, environmental, and social performance and the status of their implementation, in the relevant sections within the report.	NR	OK	OK
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	pp. 46, 51	Corporate Governance	Tongaat Hulett is committed to sound corporate governance and ethical leadership in all its business practices. It continues to uphold and endorse the application of the principles recommended in the Code of Corporate Practices and Conduct embodied in the King II Report. The company recognises the need to add value to all stakeholders, conduct business with openness, integrity and accountability, and provide timely, relevant and meaningful reporting. The board of directors believes that it has complied, in all material respects, with the provisions of the King II Code and the related Listings Requirements of the JSE Limited (JSE), as well as all the applicable statutes and regulatory requirements guiding its conduct throughout the period under review. As part of its ongoing commitment to corporate discipline, ethical leadership, sustainability and good citizenship, Tongaat Hulett welcomes the recent introduction of The King Code of Governance Principles (King III). Proactive steps are being taken to ensure the appropriate application of the principles relevant to Tongaat Hulett in advance of the reporting required in the 2011 Annual Report. As part of its ongoing commitment to corporate discipline, ethical leadership, sustainability and good citizenship, Tongaat Hulett welcomes the recent introduction of The King Code of Governance Principles (King III). Proactive steps are being taken to ensure the appropriate application of the principles relevant to Tongaat Hulett in advance of the reporting required in the 2011 Annual Report. The roles and responsibilities of the directors, as well as the company's code of ethics for directors and employees, are detailed in a Corporate Governance Manual. This, together with established policies and practices on matters such as safety, health and environment, social investment, broad based black economic empowerment and employment equity, provide a sound framework for sustainable corporate governance within Tongaat Hulett. The Code of Ethics summary is also included in page 51	NR	NI	NI

4. Governance, Commitments, and Engagement

Profile Disclosure	Description	Reference	Section	Comments	C	B	A
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	p. 35	Social Performance	A partial response to this indicator is included in the 'Management Approach' section.	NR	NI	NI
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	p. 50	Risk Committee	No concerns.	NR	OK	OK
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Throughout	Throughout	Where relevant, it appears that charters are mentioned...such as the CDP, GRI, etc.	NR	OK	OK
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	45	Social Performance	"The company continued its association with the National Business Initiative and contributed R213 000 during the reporting period. In addition to the donation of funds to worthy projects, expertise is made available by company management to guide community projects. Where appropriate, SED initiatives are linked with business objectives through a corporate social partnership approach, to ensure that the company's involvement is in line with community priorities. The total SED spend for the 15 months to 31 March 2010 including the cost of company sponsored occupational and primary health care services was R130,7 million. This was above the company's commitment to allocate one percent of annual headline earnings to SED on a company wide basis annually. Additional information - Tongaat actively participates in NBI activities. In addition, Tongaat has representation at its KZN Board level. Additional information - Tongaat actively participates in NBI activities. In addition, Tongaat has representation at its KZN Board level. http://www.nbi.org.za/welcome.php?pg=2&pgm=Me&id=11071 "	NR	NI	NI

4. Governance, Commitments, and Engagement

Profile Disclosure	Description	Reference	Section	Comments	C	B	A
4.14	List of stakeholder groups engaged by the organization.	p. 40	Stakeholder Engagement	No concerns.	OK	OK	OK
4.15	Basis for identification and selection of stakeholders with whom to engage.	pp. 40 - 41	Stakeholder Engagement	No concerns.	OIK	OK	OK
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	pp. 40 - 41	Stakeholder Engagement	This section could be significantly improved to provide greater detail about who is engaged, how often, in what format(s) and what the topics are covered during engagement sessions.	NR	NI	NI
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	pp. 40 - 41	Stakeholder Engagement	This section could be significantly improved to provide greater detail about who is engaged, how often, in what format(s) and what the topics are covered during engagement sessions.	NR	NI	NI

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

G3 DMA	Description	Reference	Section	Comments			
DMA EC	Disclosure on Management Approach EC (NB: The Disclosure(s) on Management Approach should provide a brief overview of the organization's management approach to the Aspects defined under each Indicator Category in order to set the context for performance information.)	p. 41	Economic Sustainability	DMAs ALL required additional information, as per the GRI Guidelines recommendations and/or explanations. However, this could be included in a comprehensive GRI Indicator Table (see attached file).	NR	NI	NI
DMA EN	Disclosure on Management Approach EN	p. 32	Environmental Stewardship	DMA for EN is of little or no concern, although the presentation of information could be improved. Future reporting should be sure to include comparable and/or year-on-year trend data.	NR	NI	NI
DMA LA	Disclosure on Management Approach LA	p. 35	Social Performance	As above	NR	NI	NI

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

G3 DMA	Description	Reference	Section	Comments			
DMA HR	Disclosure on Management Approach HR	p.51	Code of Ethics	<p>The company operates within a Code of Ethics, which supports its commitment to a policy of fair dealing, honesty and integrity in the conduct of its business. The Code of Ethics has been endorsed by the board, communicated and distributed to all employees across all levels in the company. The Code is based on a fundamental belief that all business transactions should be legal and conducted beyond reproach in the spirit of honesty, fairness and unquestionable ethics. The company has a zero tolerance approach to any violation of the law or unethical business dealing by any employee, including bribery and money laundering. The Code also addresses conflict of interest situations and encourages employees to report on any conflict or perceived conflict of interest situation. This may arise due to employees being offered and receiving gifts in return for favours, employees not being independent from business organisations having a contractual relationship or providing goods or services to Tongaat Hulett, and employees' personal investments taking priority over transactions for the company and its clients.</p> <p>Compliance by all employees to the high moral, ethical and legal standards of the Code is mandatory, and if employees become aware of, or suspect, a contravention of the Code, they must promptly and confidentially report it to the Company Secretary or senior officials at management level. Tongaat Hulett has engaged the services of an independent whistle blowing service provider to provide mechanisms to report on unethical behaviour or non-compliance with the Code of Ethics. The Audit and Compliance Committee assists the board in overseeing the consistent application of and compliance with the Code. Appropriate action is taken in respect of all reported instances of non-compliance with the Code by employees. No material infractions of the Code have been reported during the period under review.</p>	NR	NI	NI

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

G3 DMA	Description	Reference	Section	Comments			
DMA SO	Disclosure on Management Approach SO	pp 35-40	Social Performance	<p>“Ethical integrity and social responsibility are core principles of the manner in which the company conducts its business. Tongaat Hulett views the achievements of targets in this area as central to the organisation’s continued success. The company builds enduring relationships with its stakeholders that are characterised by mutual respect, active partnerships and long term commitment. Performance on social dimensions continued on a positive trend, from the previous reporting period, with notable progress on all dimensions: safety, health, talent management and people development. DMA SO</p> <p>Tongaat Hulett is striving to create a workplace free of fatalities and injuries. Operations in South Africa comply with the requirements of the Occupational Health and Safety Act, or the country equivalent for its operations in Botswana, Namibia, Mozambique, Swaziland and Zimbabwe. Management in each of the operations is required to ensure that all legal requirements are complied with, and where legislation does not exist, leading practices identified and implemented.</p>	NR	NI	NI
DMA PR	Disclosure on Management Approach PR	pp. 31,34	Introduction to the Sustainability Report	<p>“In the context of operating in an increasingly dynamic world, where issues such as climate change and renewable energy are taking on greater relevance, stakeholders continue to expect that Tongaat Hulett will act in a fair and responsible manner. Meeting this expectation is core to business sustainability and it is pleasing that the company is recognised as a leading manufacturer of a range of high-quality products. Tongaat Hulett recognises its responsibility to contribute to the health and safety of its employees and the principles of fairness, integrity and respect are core to the company’s dealings with employees. It is committed to minimising the impact on the environment and regular reviews of existing initiatives and measurements of performance are the norm.</p> <p>Food Safety</p> <p>Tongaat Hulett continues to manage its maize requirements on a non-genetically modified basis using a sophisticated identity preservation system. This ensures the company’s ability to meet the needs of its customers in the food industry. In addition, ongoing attention is paid to the requirements of ISO 9001, the Hazard Analysis Critical Control Point system (HACCP) and ISO 22000, in terms of quality and food safety standards at all operations and these systems are in various stages of being certified by the South African Bureau of Standards (SABS).”</p>	NR	NI	NI

STANDARD DISCLOSURES PART III: Performance Indicators

Economic Performance Indicator	Description	Reference	Section	Explanation			
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	p. 44	Value Added Analysis	No concerns.	OK	OK	OK
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	pp. 32 - 34, 50	Energy, CC and CM; Risk Committee	No concerns.	OK	OK	OK
EC3	Coverage of the organization's defined benefit plan obligations.	pp. 72, 93 - 96	Employee Benefits, Retirement Benefits	Employee benefits should be mentioned beyond the Notes to the Financial Statements	NI	NI	NI
EC4	Significant financial assistance received from government.	na	na	This indicator is not covered in the report	NC	NC	NC
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	na	na	This indicator is not covered in the report	NR	NC	NC
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	p. 42	Preferential Procurement	Some information is provided, but this is not specifically/ explicitly spelled out in terms of proportions of spending, and thus the information could be improved.	NI	NI	NI
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	pp. 41 - 42	Broad Based Black Economic Empowerment	No concerns.	OK	OK	OK
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	pp. 44 - 45	Value Added Statement, Socio Economic Development	No concerns.	OK	OK	OK
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	pp. 42 - 44	Enterprise Development and Transformation in Agriculture	No concerns.	NR	OK	OK

Environmental

Performance Indicator	Description	Reference	Section	Comments			
EN1	Materials used by weight or volume.	na	na	Not found in the report.	NC	NC	NC
EN2	Percentage of materials used that are recycled input materials.	p. 34	Water Conservation	A comprehensive response is not found in the report... although mention is made of water recycling for re-use.	NI	NI	NI
EN3	Direct energy consumption by primary energy source.	p. 33	Energy. CC and CM	Some energy consumption data is provided, but not all. Where is the petrol and/or diesel consumption data? Mention is made of them...but no data is provided.	NI	NI	NI
EN4	Indirect energy consumption by primary source.	p. 33	Energy. CC and CM	Assuming electricity is the only indirect energy consumed, data is supplied...although it would be useful to provide a more robust breakdown per site, as well as historical/trend data... and to normalize consumption to a unit of production ratio.	NI	NI	NI

Environmental							
Performance Indicator	Description	Reference	Section	Comments			
EN5	Energy saved due to conservation and efficiency improvements.	p. 33	Energy. CC and CM	Some information about co-generation is provided, but this does not necessarily discuss conservation and/or efficiency improvements adequately.	NR	NI	NI
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	p. 33	Energy. CC and CM	Some information about co-generation is provided, but this does not necessarily provide a full discourse on energy efficiency and/or renewable energy-based products.	NR	NI	NI
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	p. 33	Energy. CC and CM	A fairly weak response, but at least data is provided.	NR	NI	NI
EN8	Total water withdrawal by source.	p. 34	Water Conservation	A discourse is provided, but more meaningful data - including historical data - would be useful.	NI	NI	NI
EN9	Water sources significantly affected by withdrawal of water.	p. 34	Water Conservation	Basic mention of "rivers" is found, but an adequate response was not found in the report.	NR	NI	NI
EN10	Percentage and total volume of water recycled and reused.	p. 34	Water Conservation	Percentages are not provided.	NR	NI	NI
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	p. 34	Biodiversity and Land Management	Data is only provided for South Africa, yet the boundaries of the report suggest that information is available for all 6 countries. Number also only refers to land used and that which might have other development uses; not specific to biodiversity.	NI	NI	NI
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	p. 34	Biodiversity and Land Management	A very basic response is provided, but ONLY for South Africa.	NI	NI	NI
EN13	Habitats protected or restored.	p. 34	Biodiversity and Land Management	State how much land they plan to rehabilitate (only in SA). No mention of land that has already been rehabilitated.	NR	NI	NI
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	p. 34	Biodiversity and Land Management	A very basic response is provided, but ONLY for South Africa.	NR	NI	NI
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	na	na	Not found in the report.	NR	NC	NC
EN16	Total direct and indirect greenhouse gas emissions by weight.	p. 33	Energy. CC and CM	A response is found, although the data could be much better presented to fully explain the story.	NI	NI	NI
EN17	Other relevant indirect greenhouse gas emissions by weight.	na	na	Not found in the report.	NC	NC	NC
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	p. 33	Energy, CC and CM	No concerns.	NR	OK	OK
EN19	Emissions of ozone-depleting substances by weight.	na	na	Not found in the report.	NC	NC	NC

Comments							
Performance Indicator	Description	Reference	Section	Comments			
EN20	NOx, SOx, and other significant air emissions by type and weight.	na	na	Not found in the report.	NC	NC	NC
EN21	Total water discharge by quality and destination.	p. 34	Effluent	A fairly weak response, but at least some mention is made. The 'zero effluent' mention could be deemed 'misleading', as it only pertains to "some operations", and does not necessarily reflect TH as a whole. Quantitative data should be provided, where available.	NI	NI	NI
EN22	Total weight of waste by type and disposal method.	p. 34	Waste	Weights are provided, but not disposal methods.	NI	NI	NI
EN23	Total number and volume of significant spills.	na	na	Not found in the report.	NC	NC	NC
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	p. 34	Waste	No concerns.	NR	OK	OK
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	na	na	Not found in the report.	NC	NC	NC
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	pp. 32 - 35	Environmental Stewardship	No concerns.	OK	OK	OK
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	na	na	Not found in the report.	NC	NC	NC
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	p. 35	Environmental Compliance	Adequate response identified.	OK	OK	OK
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	na	na	Not found in the report.	NR	NC	NC
EN30	Total environmental protection expenditures and investments by type.	na	na	Not found in the report.	NR	NC	NC

Social: Labour Practices and Decent Work

Performance Indicator	Description	Reference	Section	Comments			
LA1	Total workforce by employment type, employment contract, and region.	Throughout	Throughout	Much more detail would be required, including data for the current reporting period with respect to BBBEE stats, in order to be a reasonable response in the SA context.	NI	NI	NI
LA2	Total number and rate of employee turnover by age group, gender, and region.	na	na	Not found in the report.	NC	NC	NC
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	na	na	Not found in the report.	NR	NC	NC
LA4	Percentage of employees covered by collective bargaining agreements.	p. 40	Labour Relations	Metion is made of 13 unions representing 67% of permanent employees. However, the information/discussion could be improved.	NI	NI	NI
LA5	Minimum notice period's regarding significant operational changes, including whether it is specified in collective agreements.	na	na	Not found in the report.	NC	NC	NC
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	na	na	Not found in the report.	NR	NC	NC
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	p. 35	Safety	Only the number of LTIs is recorded. Hours worked, days lost due to injury and other key indicators for safety are not reported.	NI	NI	NI
LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	pp. 36 - 37	Health	Information is provided, although additional information is likely available to provide a much more robust response.	NI	NI	NI
LA9	Health and safety topics covered in formal agreements with trade unions.	na	na	Not found in the report.	NR	NC	NC
LA10	Average hours of training per year per employee by employee category.	p. 37	Talent Management and People Development	Total stats for 'person days trained' are provided, but no breakdown in terms of level...nor historical data.	NI	NI	NI
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	pp. 37 - 38	Talent Management and People Development	Although the information/discussion could be improved, the information provided is a reasonable response to this indicator.	NR	NI	NI
LA12	Percentage of employees receiving regular performance and career development reviews.	na	na	Not found in the report.	NR	NC	NC
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	p. 38	Employement Profile	Thorough, but it is as of 31 Dec 2008.... Could be MUCH more relevant.	NI	NI	NI
LA14	Ratio of basic salary of men to women by employee category.	na	na	Not found in the report.	NC	NC	NC

Social: Human Rights

Performance Indicator	Description	Reference	Section	Comments			
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	na	na	Not found in the report.	NC	NC	NC
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	na	na	Not found in the report.	NC	NC	NC
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	na	na	Not found in the report.	NR	NC	NC
HR4	Total number of incidents of discrimination and actions taken.	na	na	Not found in the report.	NC	NC	NC
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	p. 40	Labour Relations	Right to join unions is stated; specific measures related to the protection of these rights is not included.	NI	NI	NI
HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour.	na	na	Not found in the report.	NC	NC	NC
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour.	na	na	Not found in the report.	NC	NC	NC
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	na	na	Not found in the report.	NR	NC	NC
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	na	na	Not found in the report.	NR	NC	NC

Social: Society

Performance Indicator	Description	Reference	Section	Explanation			
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	pp. 44 - 45	ED and SED	Mention is made of what TH is doing with respect to ED and SED, but no mention is really made with respect to the assessment and/or 'management' of impacts on communities, including entering, operating and exiting.	NI	NI	NI
SO2	Percentage and total number of business units analyzed for risks related to corruption.	p. 51	Code of Ethics	Whistle blowing policy	OK	OK	OK
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	na	na	Not found in the report.	NC	NC	NC
SO4	Actions taken in response to incidents of corruption.	na	na	Not found in the report.	NC	NC	NC
SO5	Public policy positions and participation in public policy development and lobbying.	na	na	c	NC	NC	NC
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	na	na	Not found in the report.	NR	NC	NC
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes.	na	na	Not found in the report.	NR	NC	NC
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	na	na	Not found in the report.	NC	NC	NC

Social: Product Responsibility

Performance Indicator	Description	Reference	Section	Comments			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	na	na	Not found in the report.	NC	NC	NC
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	na	na	Not found in the report.	NR	NC	NC
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	na	na	Not found in the report.	NC	NC	NC
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	na	na	Not found in the report.	NR	NC	NC
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	na	na	Not found in the report.	NR	NR	NC
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	na	na	Not found in the report.	NC	NC	NC
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	na	na	Not found in the report.	NC	NC	NC
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	na	na	Not found in the report.	NC	NC	NC
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	na	na	Not found in the report.	NC	NC	NC