

OCEANA GROUP

GRI SUSTAINABILITY REPORTING STANDARDS

Disclosure Number	Disclosure Title	Oceana Response 2019
GRI 102: GENERAL		
ORGANISATIONAL PROFILE		
102-1	Name of the organization	Oceana Group
102-2	Activities, brands, products, and services	See section Oceana at a glance , SR page 8-9.
102-3	Location of headquarters	Oceana House, 26 Jan Smuts Street, Foreshore, Cape Town.
102-4	Location of operations	South Africa, the United States, Angola and Namibia. See Oceana at a glance , SR page 8-9.
102-5	Ownership and legal form	Oceana Group was incorporated in 1918 and is listed on the Johannesburg and Namibian Stock Exchanges. See overview of Ownership , IR page 6.
102-6	Markets served	Oceana Group markets its products globally. See Oceana at a glance , SR page 8-9.
102-7	Scale of the organization	See the following sections in the IR: Oceana at a glance page 6-7, Divisional performance reviews , pages 78-93, Summarised group financial statements , pages 94-97; and workforce data in our online Consolidated non-financial data .
102-8	Information on employees and other workers	At year end we had 3 165 permanent and 1 228 seasonal employees. Further details are provided in our Consolidated non-financial data , available online (through our website www.oceana.co.za).
102-9	Supply chain	See Our business model: how we create value , IR page 10-15.
102-10	Significant changes to the organization and its supply chain	There were no significant changes. See About this report , SR page 3.



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102-11	Precautionary Principle or approach	Oceana is committed to integrating the 10 principles of the United Nations Global Compact into the strategy - see our Support letter and Communication on progress . The 'precautionary principle' is integrated throughout our environmental performance standards. Precautionary measures are reviewed in the Oceana SR, page 24.
102-12	External initiatives	Oceana is a signatory to the United Nations Global Compact.
102-13	Membership of associations	Fishing industry body, FishSA, created collectively to address and respond to issues of mutual concern. Participation in and membership of relevant industry bodies and associations, for example, Responsible Fishing Alliance (RFA); National Business Initiative; Black Management Forum; Global Chain Alliance; International Fishmeal and Fish oil Organisation. Signatory to the United Nations Global Compact. See Collaborating with partners , SR page 24, and further details in the online Sustainability governance and management systems .
STRATEGY AND ANALYSIS		
102-14	Statement from senior decision-maker	See Letter from the CEO , SR page 6-7, and Chairman's report and CEO's report in the IR, pages 20-25.
102-15	Key impacts, risks, and opportunities	See section reviewing Our business model: how we create value , SR page 10-11. Our approach to managing the key impacts, risks and opportunities is reviewed in the respective SR focus area chapters. See also section on Managing our material risks , IR page 30-35.
ETHICS AND INTEGRITY		
102-16	Values, principles, standards, and norms of behaviour	The Oceana values are outlined on our website. The business code of conduct and ethics and other ethical leadership principles and mechanisms are covered in the section Ensure good governance and sustainability , IR page 52-61. See the Oceana code of business conduct and ethics .



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102-17	Mechanisms for advice and concerns about ethics	Whistle Blowers is an independent information gathering company, which offers an anonymous and secure platform for whistleblowing.
GOVERNANCE		
102-18	Governance structure	See sections Governance structure , IR page 60, and Who governs us, and leads us , IR page 18-19.
102-19	Delegating authority	See sections Ensure good governance and sustainability , IR page 52-61, and our Sustainability governance and management systems , reviewed online.
102-20	Executive-level responsibility for economic, environmental, and social topics	See sections Ensure good governance and sustainability , IR page 52-61, and our Sustainability governance and management systems , reviewed online. Oceana's commitment to good governance is further reviewed in our website section on Compliance and King IV .
102-21	Consulting stakeholders on economic, environmental, and social topics	See section Engage stakeholders and manage reputations , IR page 47-51. We use various consultation processes and information is fed back to the board via the board committees, reviewed in the section Ensure good governance and sustainability , IR page 52-61. Further information is provided in the online review of Oceana's Compliance and King IV .
102-22	Composition of the highest governance body and its committees	See sections on Who governs us and Who leads us , IR page 18-19. Our Board Diversity policy is available through our website. The targets are detailed in the policy.
102-23	Chair of the highest governance body	The chairman, Mustaq Brey is a non-executive director.
102-24	Nominating and selecting the highest governance body	The remuneration and nominations committee use the policy on selection and appointment of directors to review board members' qualifications, competence, gender, diversity and independence, as part of the assessment.
102-25	Conflicts of interest	Directors and employees are required to observe the highest ethical standards in conducting the group's business. See review of ethical leadership in the section Ensure good governance and sustainability , IR page 52-61. The directors and senior management are



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		required to submit a list of other directorships and interests in contracts with Oceana.
102-26	Role of highest governance body in setting purpose, values, and strategy	See sections: Sustainability governance online, Board governance at a glance , IR page 57, and Oceana's Compliance section on our website.
102-27	Collective knowledge of highest governance body	This is reviewed in the section Who governs us , IR page 18. Continuing professional development (CPD) of individual directors is encouraged, however, the company does not implement specific in-house programmes to address this. Directors are expected to attend to this requirement according to their profession's prescriptions, through attendance at seminars, presentations and workshops, and by following business reporting in the media.
102-28	Evaluating the highest governance body's performance	See review of ethical leadership in the section Ensure good governance and sustainability , IR page 52-61. Currently the board is not evaluated on its environmental/social/economic performance; however, appraisals do include these criteria.
102-29	Identifying and managing economic, environmental, and social impacts	See the social, ethics and transformation committee (SETCOM/ SET Committee) section, IR page 61, and Oceana's Sustainability governance review online.
102-30	Effectiveness of risk management processes	The SET committee has board oversight of sustainability. See section Delivering value through effective governance , IR page 32-35 and Sustainability governance review online.
102-31	Review of economic, environmental, and social topics	The SET committee's charter requires a minimum of two meetings per year, which were duly held and fully attended by all members.
102-32	Highest governance body's role in sustainability reporting	The board reviews the sustainable development report. The SETCOM has board oversight of sustainability. See IR pages 60-61 and Sustainability governance review online.
102-33	Communicating critical concerns	Our group risk assessment process ensures that the board receives information regarding our critical concerns. See section on Managing our material risks , IR page 30. Through various consultation mechanisms, board committees feed information to the board. See Engage



REGISTERED COMPANY NAME: Oceana Group Limited REGISTRATION NUMBER: 1939/001730/06

DIRECTORS: MA Brey (Chairman), I Soomra (CEO*), ZBM Bassa, PG de Beyer, A Jakoet, S Pather, NA Pangarker, L Sennelo,

NV Simamane COMPANY SECRETARY: A Fortune

(Executive Director *)

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		stakeholders and manage reputations , IR page 47-51, and our Sustainability governance review online.
102-34	Nature and total number of critical concerns	The most material issues are communicated throughout the SR and IR, as are the responses to these issues.
102-35	Remuneration policies	All remuneration practices are guided by our remuneration policy. Equal pay is provided for both men and women in line with the skills, position and relevant experience and is guided by the remunerations policy. It is company policy not to discriminate on the grounds of gender. The remuneration committee considers compensation and performance of the board. See section Remuneration and performance , IR pg. 62-69.
102-36	Process for determining remuneration	The board has delegated the responsibility for remuneration to the remuneration committee. See section Remuneration and performance , IR pg. 62-69.
102-37	Stakeholders' involvement in remuneration	We use various consultation processes and information is fed back to the board via its board committees. The section Engage stakeholders and manage reputations , IR page 47-51, includes a list of our core stakeholder groups, how we engage with them, their key interests, and our response.
102-38	Annual total compensation ratio	We do not report publicly on this ratio.
102-39	Percentage increase in annual total compensation ratio	We do not report publicly on this ratio.
STAKEHOLDER ENGAGEMENT		
102-40	List of stakeholder groups	Oceana's key stakeholder groups are identified in the section Engage stakeholders and manage reputations , IR page 47-51.
102-41	Collective bargaining agreements	58% of the group's employees are members of a union.
102-42	Identifying and selecting stakeholders	See section Engage stakeholders and manage reputations , IR page 47-51.



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102-43	Approach to stakeholder engagement	See section Engage stakeholders and manage reputations , IR page 47-51.
102-44	Key topics and concerns raised	See section Engage stakeholders and manage reputations , IR page 47-51.
MATERIAL ASPECTS AND BOUNDARIES		
102-45	Entities included in the consolidated financial statements	The group's key divisions are Lucky star; Daybrook; BCP Horse mackerel, hake, lobster and squid; and CCS Logistics. See Oceana at a glance, SR page 8-9.
102-46	Defining report content and topic Boundaries	Oceana has assessed materiality as part of the enterprise-wide risk identification and management system; see About this report , SR page 3, Aligning Group strategy and social purpose , SR page 12-13, and Managing material risks , IR page 30.
102-47	List of material topics	Our sustainability focus areas and material risks are outlined in the SR, pages 11- 12.
102-48	Restatements of information	There have been no significant restatements of data during the year.
102-49	Changes in reporting	Since last year there have been no significant changes to the group's organisational structure.
REPORTING PROFILE		
102-50	Reporting period	1 October 2018 to 30 September 2019.
102-51	Date of most recent report	2018
102-52	Reporting cycle	Annual, financial year-ending 30 September.
102-53	Contact point for questions regarding the report	companysecretary@oceana.co.za
102-54	Claims of reporting in accordance with the GRI Standards	See About this report , SR page 3. This document, available on the Oceana website - www.oceana.co.za .
102-55	GRI content index	This document, available on the Oceana website - www.oceana.co.za .
102-56	External assurance	See About this report , SR page 3.
GRI 103: MANAGEMENT APPROACH		



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103-1	Explanation of the material topic and its Boundary	See About this report , SR page 3. As part of the process to determine the sustainable development material issues to be included in the SR, this is considered and covered in the SR. The issues of material interest to our stakeholders are listed in the table in the section on Engage stakeholders and manage reputations , IR page 47-51 – although this does not make explicit reference to the GRI topics, these can be inferred from the table. Material topics have been chosen with the aim of demonstrating our impacts, risks and opportunities and how we create, preserve and erode value over time.
103-2	The management approach and its components	Oceana's approach to sustainability governance and management systems , available through our website, outlines how we ensure accountability, fairness and transparency in relation to social and environmental challenges. Our approach to managing specific material topics is addressed in the respective sections of our SR.
103-3	Evaluation of the management approach	We report annually on our progress in addressing material topics and impacts in the SR and the IR. Internal reports to the respective committees ensure that performance is monitored regularly. Where required, we review and work to revise and improve our approach with key stakeholders to improve our performance.
SPECIFIC STANDARD DISCLOSURES		-
ECONOMIC PERFORMANCE		
201-1	Direct economic value generated and distributed	See section on Statistical and financial data , IR page 76-77, and Chief financial officer's report , IR page 70-74.
201-2	Financial implications and other risks and opportunities due to climate change	Addressing the impacts of climate change on the business is a material issue and issues are raised in various sections of the SR and notably in the section on climate change , SR page 31-32. A detailed assessment of the risks and opportunities of climate change is available in our latest CDP submission, available at www.cdproject.net . A key issue is the variation



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		in availability of marine resources due to human action.
201-3	Defined benefit plan obligations and other retirement plans	Details are provided in the Annual Financial Statements 2019 - defined contribution plans on page 15 and note 30, page 64.
201-4	Financial assistance received from government	Not material. We do not receive any significant financial assistance from government.
MARKET PRESENCE		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	We are committed to providing competitive and fair wages and believe that we do so at all our operations. All employees in the bargaining unit are paid in line with an agreement which includes minimum rates of pay. Currently we do not collect the required data; we plan to do so in the future.
202-2	Proportion of senior management hired from the local community	Oceana is committed to the Employment Equity Act 55 and is committed to ongoing localisation regarding our hiring policies. See section Innovating for inclusive development , SR page 16-18.
INDIRECT ECONOMIC IMPACTS		
203-1	Infrastructure investments and services supported	The Oceana Foundation was launched in 2011 to consolidate the overall CSI expenditure by the group. Our contribution is reviewed in the section Responding to community needs , page 36-45.
203-2	Significant indirect economic impacts	Information is provided in the focus area chapters of the Oceana SR and in the section on Our business model: how we create value , IR page 10-15.
PROCUREMENT PRACTICES		
204-1	Proportion of spending on local suppliers	R 1 954 814 336 billion spent on preferential procurement in South Africa with R 1 933 890 676,10 billion recognised spend on BEE suppliers in South Africa (92.64% of total measured spend). 135% recognition rating for procurement in terms of the DTI's B-BBEE scorecard.
ANTI-CORRUPTION		



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205-1	Operations assessed for risks related to corruption	All our operations are monitored for fraudulent activity and corruption including suppliers. No specific corruption related risks have been identified.
205-2	Communication and training about anti-corruption policies and procedures	The group's code of business conduct and ethics is distributed to all new employees on joining the group and there are regular refresher sessions that address the key items covered by the Code. The group also subscribes to online compliance training for nominated employees, which includes a module on anti-bribery and corruption. Our whistle blowers programme forms part of this training. For further information see the Oceana UNGC COP 2019 .
205-3	Confirmed incidents of corruption and actions taken	There were no incidents of corruption confirmed during the review period.
ANTI-COMPETITIVE BEHAVIOUR		
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	There were no such legal actions during the review period.
PRODUCTS AND SERVICES		
301-1	Materials used by weight or volume	Oceana's resource usage data is reported in the SR, page 34-35, and in our online non-financial consolidated data .
301-2	Recycled input materials used	Currently very little of our primary packaging contains recycled material. Food integrity is of prime importance and we are unable to use recycled content in certain products. Lobster and horse mackerel carton packing boxes use recycled material. A percentage of the metals used in the manufacturing process of the Lucky Star cans and lids are from recycled material. The percentage varies per batch received and has not been quantified.
301-3	Reclaimed products and their packaging materials	Due to the nature of the company's core business and its primary product type, Oceana does not deem this a sufficiently material issue. Oceana measures partially against this parameter: A percentage of the lobster sales in polystyrene boxes is recycled by the importers. We do not reclaim any packaging (other than



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		lobster), whether it is sold locally or internationally.
ENERGY		
302-1	Energy consumption within the organization	Data on Oceana's energy consumption is provided on SR page 35 and in our resource usage data table in our online non-financial consolidated data .
302-2	Energy consumption outside of the organization	Data on Oceana's energy consumption is provided in our resource usage data table in our online non-financial consolidated data .
302-3	Energy intensity	A review of our performance is provided in our Oceana Carbon Footprint 2019 .
302-4	Reduction of energy consumption	See section on energy and emissions , SR pg. 34-35, and environmental performance targets , SR page 33.
302-5	Reductions in energy requirements of products and services	See section on Reducing energy consumption and emissions , SR page 32, environmental performance targets , SR pg. 33.
WATER		
303-1	Water withdrawal by source	Oceana's total municipal water usage was 209 578 kilolitres.
303-2	Water sources significantly affected by withdrawal of water	All of Oceana's water requirements are sourced from municipal supplies.
303-3	Water recycled and reused	Water consumption in relation to production output is monitored monthly against production targets. The annualised water consumption rate was 0.2 kilolitres per ton of product produced or stored and handled. Oceana does not currently measure its water recycling and reuse.
BIODIVERSITY		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Many of Oceana's factories are located near to the high-water mark. We take care to ensure that nesting birds are not disturbed, and that birds' nests are removed by SANCCOB before maintenance on roofs is undertaken. Oceana owns 626,9157 ha in St Helena Bay, 4,4023 ha in Hout Bay, 0,464 ha in Humansdorp and 3.9 ha in Laaiplek. Oceana leases 2,1170 ha in Hout Bay, 3,8142 ha in St Helena Bay, 4,6381 ha in Lambert's Bay, 0,3173 ha in Jacobs Bay, 1.07 ha



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		in Laaiplek, 1.2 ha in V&A Waterfront, 0.3 in Saldanha Bay, 0.2 ha in Kommetjie and 0,1438 ha in Elands Bay.
304-2	Significant impacts of activities, products, and services on biodiversity	Oceana's environmental control system requires an Environmental Management Plan (EMP) to be in place. Our EMPs are aligned with the location of the respective operation and its impact on biodiversity. Scientific reports refer to an ecosystem approach to fishing to minimise our impacts on biodiversity. We consider each of our unique fisheries and scientific reports are commissioned on each, which are available on our website. We work with the Department of Agriculture, Forestry and Fisheries and independent scientists funded by the industry.
304-3	Habitats protected or restored	Oceana has limited impact on natural habitats. Where spillages occur, they are contained, and remedial action taken as necessary. Operations avoid interfering with nesting sea birds. At sea our hake vessels take measures to protect the sea bird population and implement our Bird Mitigation Plan. Oceana adheres to Marine Protected Areas as well as closed areas regulations. Oceana works with all relevant scientific working groups to participate in habitat protection strategies. Oceana is a founder member of the Responsible Fisheries Alliance (RFA), and has partnered with WWF-SA, Birdlife South Africa other fishing companies in the RFA to promote an ecosystem approach to fisheries management.
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	The African penguin is on the IUCN red list. The ecosystem approach to management of this fishery incorporates the needs of penguins. Commercial fishing rights are measured against the SASSI green list. At sea, our by-catch is managed by our permits and we have a Bird Mitigation Plan.
EMISSIONS		



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305-1	Direct (Scope 1) GHG emissions	Absolute GHG emissions (Total scope 1, 2 and outside of scopes (other direct emissions) totalled tCO ₂ e 302 045. Detail on Scope 1 emissions can be found in: our consolidated non-financial data , the Oceana 2019 Carbon Disclosure Project (CDP) response available online at www.cdproject.net and in our Oceana Carbon Footprint 2019 report.
305-2	Energy indirect (Scope 2) GHG emissions	Absolute GHG emissions (Total scope 1, 2 and outside of scopes (other direct emissions) totalled tCO ₂ e 302 045. Detail on Scope 2 emissions can be found in: our consolidated non-financial data , the Oceana 2018 CDP response available at www.cdproject.net and in our online Oceana Carbon Footprint 2019 report.
305-3	Other indirect (Scope 3) GHG emissions	Scope 3 emissions in FY2019 totalled tCO ₂ e 76 493. Details on Scope 3 emissions can be found in the Oceana 2019 CDP response available at www.cdproject.net and in our Oceana Carbon Footprint 2019 report.
305-4	GHG emissions intensity	The group GHG emission intensity increased by 0.4% at our land-based facilities, and increased by 44% for our vessels, in comparison to FY2018. The increase in vessel GHG intensity was largely due to the reduced quota and catch rates. See GHG emission product intensity table in our online Consolidated non-financial data .
305-5	Reduction of GHG emissions	See section on environmental performance targets , Oceana SR page 33. Further detail can be found in the Oceana 2019 CDP response available at www.cdproject.net and in the Oceana Carbon Footprint 2019 report.
305-6	Emissions of ozone-depleting substances (ODS)	Oceana used 38 169.2 kg of Freon, generating 69 086.25 tCO ₂ e.
305-7	Nitrogen oxides (NO _x), sulphur oxides (SO _x), and other significant air emissions	Nitrous oxide (N ₂ O) and methane (CH ₄) emissions totalled 1 301 tCO ₂ e s and 217 tCO ₂ e respectively. Currently we do not report on boiler stack emissions or odorous emissions.
EFFLUENTS AND WASTE		
306-1	Water discharge by quality and destination	Currently we do not collect data for this performance indicator. Where water is discharged into the ocean, samples are tested,



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		and results are sent to the Department of Water Affairs.
306-2	Waste by type and disposal method	Oceana reports partially on this indicator. Details are provided in the SR on page 56, and in our online consolidated non-financial data . Oceana's activities do not generate or involve transportation, storage or trade in hazardous waste that requires special treatment.
306-3	Significant spills	Oceana did not record any significant spills during the review period.
306-4	Transport of hazardous waste	Oceana disposed of 376 tonnes of hazardous waste. The group does not import, export, treat or ship internationally any hazardous waste.
306-5	Water bodies affected by water discharges and/or runoff	We do not "significantly affect" water bodies through discharges of water and runoff. In FY2018, we received our coastal water discharge licences from the DEA for our Lucky Star St Helena Bay and Amawandle Pelagic factories. We monitor discharge quantities and quality across the group.
ENVIRONMENTAL COMPLIANCE		
307-1	Non-compliance with environmental laws and regulations	No environmental related penalties or fines were payable during the reporting period.
SUPPLIER ENVIRONMENTAL ASSESSMENT		
308-1	New suppliers that were screened using environmental criteria	Oceana does not currently measure and report on this parameter.
308-2	Negative environmental impacts in the supply chain and actions taken	We enforce a supplier code of conduct, which includes relevant environmental clause. Our supplier code of conduct has been disseminated and signed by all our suppliers. The required key performance measurements are not in place to enable measurement and reporting on this parameter. Oceana's Procurement policy includes a commitment to ensuring responsible environmental practices in our supply chain.
EMPLOYMENT		
401-1	New employee hires and employee turnover	Our annual voluntary labour turnover was 9.4%. Oceana reports levels of turnover by reason and not by age, gender and region. Details are provided in our online consolidated non-



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		financial data. Details on year-on-year headcount variation are provided in the SR, page 54.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Oceana does not report specifically on this parameter. This information is available on request.
401-3	Parental leave	We do not report specifically on the link between turnover rates and parental leave as this is not seen as being material, and the relatively low voluntary turnover figures would suggest this to be the case.
LABOR/MANAGEMENT RELATIONS		
402-1	Minimum notice periods regarding operational changes	We have systems in place aimed at ensuring effective dialogue and relations with all employee representative groups across our operations. Oceana adheres to all labour legislation relevant to the countries in which it operates.
OCCUPATIONAL HEALTH AND SAFETY		
403-1	Workers representation in formal joint management-worker health and safety committees	Health and safety committees are in place in line with the requirements of the Occupational Health and Safety Act. See online review of Oceana's sustainability governance .
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	The Group Disabling Injury Frequency Rate (DIFR) was 1.0. Data on DIFR and levels of absenteeism by Division are provided in our additional workforce data in our online consolidated non-financial data .
403-3	Workers with high incidence or high risk of diseases related to their occupation	Our activities do not present high risks of occupational disease.
403-4	Health and safety topics covered in formal agreements with trade unions	We report partially against this parameter. Recognition agreements with the unions in the Lucky Star and BCP divisions cover health and safety issues.



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TRAINING AND EDUCATION		
404-1	Average hours of training per year per employee	Oceana has not reported on this parameter this year. This information is available on request.
404-2	Programs for upgrading employee skills and transition assistance programs	Review in the section Skills development and training , SR page 50-54.
404-3	Percentage of employees receiving regular performance and career development reviews	More than 95% of our non-bargaining unit employees completed individual performance agreements. We do not report by gender and by employee category for this parameter.
DIVERSITY AND EQUAL OPPORTUNITY		
405-1	Diversity of governance bodies and employees	The composition of our permanent workforce is detailed in our online Consolidated non-financial data , on our website. The composition of our Directorate and Executive committee is provided in the Oceana IR, pages 18-19.
405-2	Ratio of basic salary and remuneration of women to men	This is not currently reported. Oceana's Human Resources management principles are based on equal opportunity and non-discrimination. As a signatory to the UNGC, Oceana upholds the core principles contained in the 1998 Declaration on Fundamental Principles and Rights at Work, including (in this context) the principle relating to non-discrimination based on gender.
NON-DISCRIMINATION		
406-1	Incidents of discrimination and corrective actions taken	Oceana has committed to uphold all rights in relation to labour as embedded within UNGC principles that incorporate the ILO provisions. Our Leadership Essentials programme for line managers includes a focus on minimising discrimination in our recruitment practices. This ensures that managers are trained to understand the company's anti-discrimination policies. Oceana experienced no incidents of discrimination during the reporting period.
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	No such operations or suppliers have been formally identified within the group. Freedom of association and collective bargaining are fundamental rights. Oceana has committed to uphold all rights in relation to labour as



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		embedded within UNGC principles that incorporate the ILO provisions.
CHILD LABOR		
408-1	Operations and suppliers at significant risk for incidents of child labour	No operations or suppliers were found to have significant risk of child labour. Oceana's Head of Procurement oversees compliance in our supply chain.
FORCED OR COMPULSORY LABOR		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	Our operations do not pose such a risk. Our supplier code of conduct includes child and forced labour clauses. Oceana's Head of Procurement oversees compliance in our supply chain.
SECURITY PRACTICES		
410-1	Security personnel trained in human rights policies or procedures	All security personnel receive training in Oceana's code of business conduct and ethics, and the group's human rights policy.
INDIGENOUS RIGHTS		
411-1	Incidents of violations involving rights of indigenous peoples	We do not believe this to be a material issue. Using the understanding of indigenous peoples as formulated for example by the International Labour Organisation and UN agencies, there are currently no such operations within Oceana Group.
HUMAN RIGHTS		
412-1	Operations that have been subject to human rights reviews or impact assessments	See section on Respecting human rights , SR page 55 and our UNGC COP 2019 , available on our website, for further information.
412-2	Employee training on human rights policies or procedures	All employees are provided with ethics awareness training, which includes general awareness on human rights issues. Our human rights policy is applied across all our operations in Angola, Namibia, South Africa and the United States. We do not measure the total hours of training.



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412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	No operations underwent human rights screening. As part of our supplier code of conduct practices, all clauses included in contracts refer to our labour policies and practices that contractors must abide by and relate to all human rights related issues.
LOCAL COMMUNITIES		
413-1	Operations with local community engagement, impact assessments, and development programs	All our operations have some degree of community engagement. Impact assessments are done as and when needed for projects, leading to development programmes where necessary. Incidents of our impact on communities are illustrated in the section Responding to community needs , SR pages 36-45.
413-2	Operations with significant actual and potential negative impacts on local communities	We do not measure the percentage of operations with significant actual and potential negative impacts on local communities. There were no significant issues at any of our operations to report this year.
SUPPLIER SOCIAL ASSESSMENT		
414-1	New suppliers that were screened using social criteria	Oceana does not currently measure and report on this parameter. All contractors are expected to abide by our supplier code of conduct. Oceana's Head of Procurement oversees supply chain compliance with the group's human right's policy.
414-2	Negative social impacts in the supply chain and actions taken	Currently not measured and reported. A head of Procurement is responsible for ensuring a standardised supplier selection process and for incorporating the evaluation of health and safety, child labour and environmental aspects into our engagement with suppliers who are considered high risk. No material impacts, or violations identified.



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PUBLIC POLICY		
415-1	Political contributions	Oceana has a policy not to support or to make any donations to political parties.
CUSTOMER HEALTH AND SAFETY		
416-1	Assessment of the health and safety impacts of product and service categories	Our full product range is continuously reviewed to establish where products may have to be assessed for health and safety impacts for improvement. See section on Adhering to strict food and feed safety standards in the SR, pages 25-27.
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	There were no incidents this year in which we received written notification of a non-compliance from the regulatory authorities.
MARKETING AND LABELLING		
417-1	Requirements for product and service information and labelling	All our food products are governed by strict food safety laws and the Consumer Protection Act and these are highly regulated. Products exported to Europe must comply with EU food regulations.
417-2	Incidents of non-compliance concerning product and service information and labelling	There were no such incidents during the review period.
417-3	Incidents of non-compliance concerning marketing communications	There were no such incidents during the review period.
CUSTOMER PRIVACY		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	There were no such complaints during the review period.
SOCIO-ECONOMIC COMPLIANCE		
419-1	Non-compliance with laws and regulations in the social and economic area	There were no incidences in the year under review.





REGISTERED COMPANY NAME: Oceana Group Limited REGISTRATION NUMBER: 1939/001730/06
DIRECTORS: MA Brey (Chairman), I Soomra (CEO*), ZBM Bassa, PG de Beyer, A Jakoet, S Pather, NA Pangarker, L Sennelo,
NV Simamane COMPANY SECRETARY: A Fortune
(Executive Director *)