

UNITED NATIONS GLOBAL COMPACT

COMMUNICATION ON PROGRESS

15 December 2017

The United Nations Global Compact is an international initiative that addresses human rights, labour, environmental and corruption issues through a commitment to ten principles derived from the Universal Declaration of Human Rights, the International Labour Organisation's Declaration of the Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption.



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1 INTRODUCTION

Our commitment to making a contribution to society is a core value of our business. In addressing this year's challenges; our continuing commitment to turning fishing rights into shared value through our operations has remained the same. It is challenge that requires our ongoing commitment to the highly contested ocean economy. An uncertain regulatory and policy environment, disputes over resources and access and the decline in fish stocks require that we engage with stakeholders and local coastal communities on solutions to secure the sustainability of our oceans, marine resources and communities and industries dependant on them.

Oceana's business is built – and is entirely dependent – on the sustainability of marine resources. It is also dependent on a network of relationships, including those with coastal communities, regulators and customers. We are in business for the long-term. It is therefore imperative that we understand and integrate key tenets of sustainability into our business. Our strategy is necessarily an integrated one, with critical societal and natural resource commitments a highlight of our five strategic business objectives. We have expanded and deepened our focus on these commitments. . Our response to key societal challenges accordingly forms the basis of Oceana's sustainability strategy and provides the framework for our annual sustainable report.

Progress on initiatives, policies and programs, aimed at managing our material risks are addressed in the Communication on Progress report. In addition to addressing environmental, social and governance (ESG) risks, Oceana's sustainability strategy addresses opportunities to: i) empower people through training, equity and remuneration; ii) reduce costs through enhancing environmental efficiencies; iii) help smaller enterprises grow into sustainable businesses; and iv) support the sustainable development of vulnerable coastal communities.

The infographic below, reflects the Sustainable Development Goals (SDG's) aligned to our core business strategy.

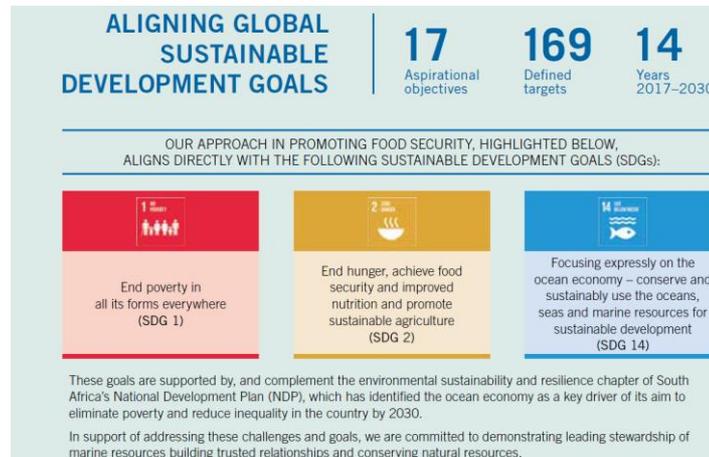


Figure 1: SDG alignment with our commitment to demonstrating leading stewardship of marine resources

The past year has delivered learnings and progress in a number of areas, which are the building blocks for a more ambitious growth strategy. These areas include:

- expanded protein footprint in Africa enabling job creation;
- investments in canning operations enabling a more stable income for seasonal employees;
- operational efficiency;
- improved water, energy efficiency and waste management;
- meeting global best practice standards, such as ISO 14001; and
- the piloting of shared value initiatives, such as empowering local entrepreneurs in a rural environment in an innovative retail development initiative.

Our commitment to converting fishing rights into shared value is a driver of innovation within the group; by formalising this in a clear strategic framework, we will be in a position to leverage these gains. Our efforts are focused on responding to the needs of small-scale fishers and to supporting partnerships that address the dual challenges of marine resources sustainability and a more diverse, inclusive and resilient fishing sector.

The report presents progress with our implementation of the UNGC principles and reflects our strategy on initiatives that are enhancing local production, increasing employment and meeting the growing demand for affordable protein. To address complex societal challenges at scale requires the competence and reach of a global company, as well as local relationships that are grounded in trust and mutual respect. We believe this combination sets Oceana apart.

1.1 UNGC self-assessment

Compliance in 2017 has been assessed in terms of the requirements of the Global Compact Self-Assessment tool. The table below reflects our compliance with the five main sustainability categories namely; management, human rights, environment, anti-corruption and labour.

Based on the findings derived from the Global Self-Assessment tool, we are implementing a plan of continual improvement.

1.1.1 Assessment methodology

The UNGC self-assessment was undertaken by a UNGC working group consisting of representatives from human resources, environmental sustainability, supply chain and compliance. The team assessed our compliance with the requirements of the assessment tool, in doing so fulfilled compliance criteria for identified actions for closure, a responsible person and a timeframe. The compliance assessment is applicable to our operations in South Africa, Namibia and the United States of America.

The results of the assessment form the basis for this Communication of Progress report.

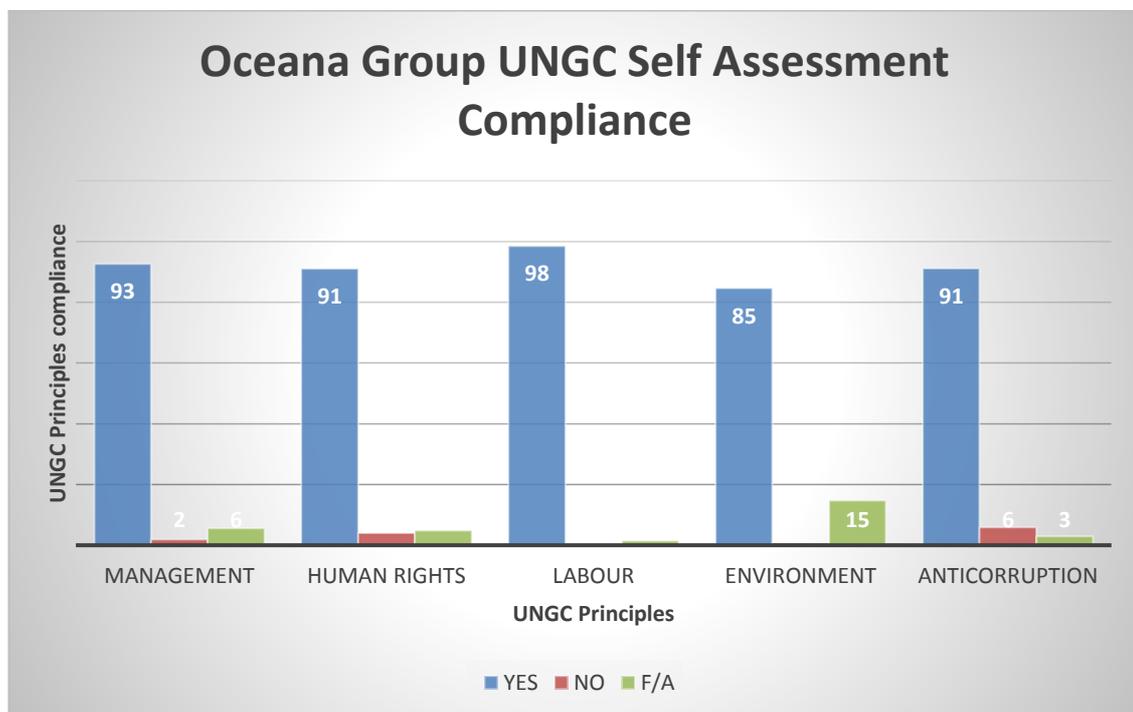


Table 1: Oceana Group 2017 UNGC Self-Assessment Results

2 HUMAN RIGHTS

2.1 Applicable Global Compact Principles:

Principle 1	respect the protection of internationally proclaimed human rights
Principle 2	ensure that the organisation is not complicit in human rights abuses

2.2 Relevant GRI Indicators

- Management Approach as described in the GRI table, 2017
- GRI G4

2.3 Measurement of Outcomes

2017 UNGC compliance self-assessment with applicable principles, compliance score of 91%.

2.3.1 Human Rights

Our organisational culture supports local and internationally recognised human rights and avoids any involvement in the abuse of human rights. We support the principles enunciated in the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization’s (“ILO”) core conventions on labour standards.

Our human rights policy aims to promote equality of opportunity and combat discrimination. The policy is applied across all our operations in Angola, Namibia, South Africa and the United States. The policy commits us to strive for full compliance with applicable legislation in the regions in which we operate, as well as to implement the human rights principles set out in the United Nations Global Compact (UNGC).

Our human rights commitments form part of the group’s code of business conduct and ethics. The policy is distributed to all new employees and to staff at regular staff refresher sessions and addresses key human rights issues. All employees are required to observe the highest ethical standards in conducting the group’s business.

With respect to compliance with the health and safety personal protection equipment (PPE) requirements, existing policy and procedures dictate the PPE requirements. The PPE procedure is applicable and specific to various tasks and job performance.

We have continued our engagement with the South African government, business and labour in preparation for the introduction of legislated minimum wage requirements. Our internal policies will be updated in accordance with minimum wage requirements. Oceana has

undertaken an investigation into our wage categories in relation to the minimum wages proposed. We found that our lowest pay salary category was well above proposed minimum wages for the sector. We are accordingly of the view we will be held to be compliant on promulgation of the minimum wages

2.3.1 Occupational Health & Safety

To manage the inherent health and safety risks associated with our land- and sea-based activities, we undertake periodic external and internal safety audits on all sites and vessels, implement effective safety monitoring, training and enforcement programmes, provide appropriate personal protective equipment, and ensure effective incident tracking and investigation. The managing directors of our operating divisions are responsible for ensuring full compliance with relevant occupational health and safety legislation, and that the required structures and systems are in place. We offer our employees access to onsite occupational health practitioners. Medical insurance, as well as an employee assistance programme (“EAP”), is offered to all staff and their families.

In support of our health and safety policy, the following training programmes were offered:

Firefighting (all levels), First Aid (all levels), safety handling of winches and lifting; competence in survival craft; GMP and HACCP; OHASA; Pre-sea training; safety officer training; personal safety training and personal surviving techniques.

Compliance with the health and safety component of the external audits for all land-based facilities was 96% (2016: 95%) and 97% for all vessels (2016: 96%). We have seen a pleasing decrease in the number and severity of safety incidents recorded at Oceana this year. The group’s disabling injury frequency rate (DIFR) 1 was once again well below the group margin ceiling of 2.0. It is pleasing to report that there were no fatalities this year.

COMPANY – LAND BASED	HEALTH AND SAFETY SCORE (%)
Oceana House CPT (1 site)	99 (FY 2016 - 96)
CCS Logistics (8 sites) - average	99 (FY 2016 – 99)
Oceana Lobster (1 site)	97 (FY 2016 – 98)
Lucky Star (2 sites) – average	98 (FY 2016 – 96)
Amawandle Pelagic	95 (FY 2016 – 88)

COMPANY – SEA BASED	HEALTH AND SAFETY SCORE (%)
Calamari Fishing – Squid fleet	98 (FY 2017 – 97)
BCP – Hake fleet	91 (FY 2016 – 94)
Lucky Star – Pelagic fleet	98 (FY 2016 – 98)
Oceana lobster – Lobster fleet	100 (FY 2016 – 96)
Amawandle - Pelagic fleet	N/A (FY 2016 - 96)

Table 2: Results of the Marsh Risk Consulting Health and Safety audited

Oceana’s EAP has now been rolled out to all sites. Employees have the opportunity to interact with EAP counsellors on various platforms, including emails, call-back SMS and the employee Web portal. Employees have continued to respond positively to onsite counselling and follow up communication. The EAP programs provided include financial training, wellness screening and HIV/Aids testing, screening and support. The EAP service is extended to families of staff members, who can call an outsourced helpline to speak to an EAP consultant for trauma counselling, legal and/or financial advice. (Paragraph should be grouped with the earlier paragraph on EAP).

2.4 Continual Improvement Commitment

2.4.1 Human Rights

Based on the self-assessment undertaken in the year, the area of focus in the immediate future will be our supply chain.

Our commitment to the continual improvement with our compliance to the UNGC human rights principles is embodied in the following initiatives proposed for implementation in the 2017 reporting period.

- Develop a programme and action plan to audit key supplier compliance with Oceana’s Supplier Code of Conduct.
- Develop and disseminate a supplier sustainability and human rights questionnaire.
- Attend on the monitoring of protection of personal information measures in line with the Protection of Personal Information Act, No 4 of 2013.

3 LABOUR

Our 2017 compliance assessment revealed 98% compliance in South Africa and Namibia, with labour related UNGC principles.

3.1 Global Compact Principles

Principle 3	Businesses should uphold freedom of association & effective recognition of the right to collective bargaining
Principle 4	The elimination of all forms of forced and compulsory labour
Principle 5	The effective abolition of child labour
Principle 6	Eliminate discrimination in respect of employment and occupation

3.2 Relevant GRI Indicators

- Management Approach as described in the GRI table, 2017
- GRI G4

3.3 Measurement of Outcomes

In our South African and Namibian operations, we continue to place a strong emphasis on being a leading employer in our industry providing jobs in an environment and sector where job security remains under threat. Oceana has seen a 0.8% increase in its 2016 workforce. We remain one of the very few companies in the industry which provides minimum guaranteed hours of work to our seasonal employees, in a cyclical natural resource business under severe stress.

We invest in providing a stimulating, culturally diverse and healthy working environment for our staff. Oceana continues to be a leader in the sector in terms of working conditions and benefits. It also plays a leadership role in society particularly with respect the development of our host communities.

The company has a relatively low annual voluntary employee turnover rate of 6.6% (2016: 5.7%), and we have lost no days to industrial action over the past seven years. This reflects positively on the strong and enduring relationships between management, employees and labour unions.

As part of our recent shift towards substantially larger imports of frozen fish for our canneries, we have managed to provide enhanced workdays and a more stable income to our seasonal employees. We have also ensured that all our labour broker agencies have signed our supplier code of conduct, which require compliance with all labour and human rights legislation.

3.3.1 Policy and Procedures

Oceana adheres to all applicable labour legislation in the countries in which we operate. The group does not permit child labour nor does it permit forced or compulsory labour. The commitment to ensuring that no child labour is used in the products and services we source is communicated to our suppliers who have all signed our Supplier Code of Conduct. Our Supplier Code of Conduct is part of compulsory 'on-boarding' requirements for all new suppliers.

The following policies are in place and have been communicated to employees:

- Maternity leave policy
- Long service policy
- Employment Equity policy
- Employee Wellness policy
- Recruitment and selection policy
- Performance Management policy
- Learning and development policy
- Health and safety policy
- Sexual harassment policy
- Study assistance policy
- Mentoring policy
- Human rights policy

3.3.2 Union membership

A number of unions have recognition agreements with different companies within the group. Employees are not discouraged from joining unions. They are also not barred from participating in union related activities.

Trade unions in South Africa and Namibia that represent our employees:

South Africa:

- Food and Allied Workers Union (FAWU)
- Trawler and Line Fishermen's Union (TALFU)
- National Certificated Fishing and Allied Workers Union (NCFAWU)
- United Democratic Food and Combined Workers Union (UDF&CWU)

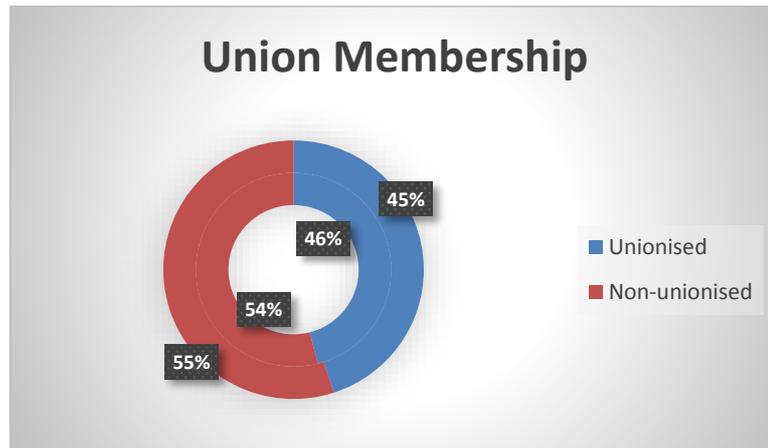
Namibia:

- Namibia Food and Allied Workers Union (NAFAU)
- Namibia Transport and Allied Workers Union (NATAWU)

Industry bodies that negotiate wages and conditions on our behalf:

- Fishing Industry Bargaining Council (deep-sea, mid-water and inshore trawling chambers)

- Employers Organisation for the Cephalopod and Associated Fisheries



There has been an increase in the number of employees who are represented by the unions referred to above.

3.3.3 Employee wellness

We offer our employees access to onsite occupational health practitioners and medical insurance, as well as an employee assistance programme, which has now been rolled out to all sites. Employees have the opportunity to interact with the Employee Wellness Assistance Programme (EAP) counsellors on various platforms, including emails, call-back SMS and the employee Web portal. Employees have continued to respond positively to onsite counselling and follow up communication.

The various EAP interventions provided include financial training, wellness screening and HIV/Aids screening and support. The EAP service is extended to families of the staff, who can call an outsourced helpline to speak to an EAP consultant for trauma counselling, legal and/or financial advice.

3.3.4 Transformation and localisation

Oceana remains strongly committed to its continued leadership of transformation and to promoting broad-based black economic empowerment (B-BBEE) in South Africa, and localisation in Namibia. Doing so forms a key part of our core purpose of efficiently converting global fishing resources into shared value and is integral to the conduct of our business.

3.3.5 Skills development

To deliver high levels of performance in a challenging context, we continue to focus on talent attraction, retention and development across the divisions. Scarcity of skills remains a key risk and challenge in the business.

Our skills development investment and initiatives are geared to enhancing individual and business performance, ensuring business continuity and accelerating workforce transformation. Our investment in skills contributes to our employment equity initiatives. It also supports youth development in the form of unemployed learnerships, apprenticeships and internship programmes. This year, we invested R22.2 million into employee skills development, with a focus on building critical skills in the areas of marine science, vessel crewing, artisans, engineering, supply chain, food safety, food quality and processing, IT and finance.

TRAINING SPEND - SA and Namibia	2017	2016
Total amount invested in Skills Development (Rm)	R22.2 mil	R 33.1 mil
Total spent on black employees	R 20.6	R30.8
Number of employees who received training	3 964	2 502
Number of employees who received training (%)	97.5	88.8

Table 3: 2017 Skill Spend

In our hake division, we launched the first phase of our Maritime Academy aimed at developing skills and building a talent pipeline of local seagoing employees. The academy will be developing maritime skills at all levels, from factory and deck hands, through to junior and senior officers and skippers. We started the year with the induction of ten unemployed Fishing Operations Learners who were part of a pool of factory hand employees; each of these learners completed four months of theory prior to going onto vessels for their practical training. Learners who completed the practical component of their course had the option to enter one of four work streams: deck; engine; production or catering. Some of the learners have found life at sea challenging; going forward we will seek to strengthen the recruitment and orientation process when taking on new learners, so to mitigate this risk.

TRAINING AREA AND DISCIPLINES	PARTICIPANTS
Apprenticeships: Fitter and turner and electrical	3
Internships: FSQA(1 learner) and Operations (5 learners)	6
Learnerships: Business administration (NQF 3 & 4), business practice (NQF 1), fish and seafood processing (NQF 3), freight handling (NQF 3), hr management (NQF 4), and hygiene and cleaning (NQF 1), manufacturing management (NQF 4), (NQF 5), road transport (NQF 2), systems support (NQF 5), wholesale and retail (NQF 4)	125, Including 41 persons with disabilities (40 unemployed)
AET: Basic literacy	15 on hake vessels
Certification programmes: Able seaman Standards of Training, Certification and Watch keeping for Seafarers (STCWs)*; Fisherman Grade 2; Fisherman Grade 3 Watch keeper; Fisherman Grade 4 Watch keeper and Marine Motorman Grade 1 and 2	12

TRAINING AREA AND DISCIPLINES	PARTICIPANTS
Graduate programme: Finance, HR, IT, Engineering (chemical and electrical), Cost and Management Accounting, Customer Management, Environmental Management, Communications, Operations, Sales and Marketing, Supply Chain Management,	28
Tertiary education: Diverse, including the following: MBA, B.Com, B.Com Honours, finance-related qualification, supply chain related qualifications, Bachelor of Law, warehousing, HR management	28
Health and safety training: Firefighting (all levels), First Aid (all levels), safety handling of winches and lifting; competence in survival craft; GMP & HACCP; OHASA; Pre-sea training; safety officer training; personal safety training and personal surviving techniques	337
SAP system Implementation: SAP navigation training, solutions management testing, time administrator training	332
Leadership development: Coaching, in-house Leadership Essentials programme, external supervisory and management development programmes.	8
Code of ethics: Including human rights policy	21 supervisory and management level staff

Table 4: Skills development and training focus area 2017

In 2017 we extended the integrated of our existing policies and procedures to subsidiaries across the group, in particular to our Angolan and American operations.

We continue to maintain our positive relations with our employees and union representatives at all levels. This is indicated by the relatively low annual voluntary labour turnover rate of 6.6 %. There have been no days lost due to industrial action during the past seven years.

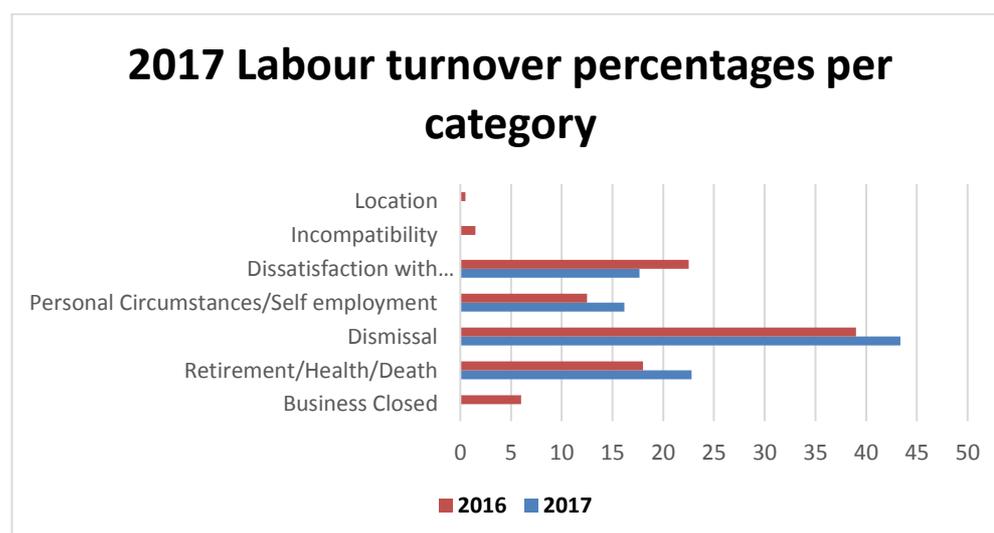


Figure 3: 2017 Labour turnover percentages per category

3.4 Continual Improvement Commitment

We believe that our leadership development framework, consisting of in-house development modules, partnerships with business schools and a coaching offering will enable our next generation of leaders to develop the change management capability required to undertake consolidation and expansion initiatives within the group.

4 ENVIRONMENT

4.1 Global Compact Principles

Principle 7	Businesses should support a precautionary approach to environmental challenges
Principle 8	Undertake initiatives to promote greater environmental responsibility
Principle 9	Encourage the development and diffusion of environmentally friendly technologies

4.2 Relevant GRI Indicators

- Management Approach is described in the GRI Table
- GRI 4

4.3 Measurement of Outcome

The 2017 compliance assessment revealed 85% compliance with the requirements of the environment component on the UNGC.

4.4 Assessments, policy and goals

We believe that, if responsibly harvested, marine-harvested protein is probably the most sustainable protein available.

The group's environmental policy provides the guiding principles for our commitment to manage and mitigate our environmental impact; it articulates our commitment to complying with legislation and regulations on the environment. The policy is applicable to all activities, products assets, (inclusive of both land based facilities and vessels) and services over which the group has operational control. The policy also articulates our expectations of suppliers in managing their environmental and social performance.

In South Africa and Namibia, the group monitors and manages the material environmental impacts of our operations through an ISO 14001-aligned environmental control system ("ECS"). The group also complies with legal and regulatory compliance policies of both countries. . Our US operations are undertaken in adherence to group policy, with the focus on the implementation of an ECS and an action plan to address identified gaps in policy. Our Angolan operations are in the process of aligning with the group's approach to environmental management.

The work undertaken to embed the ISO 14001 requirements in the organisation has resulted in an increase in our overall compliance score from 97% (2016) to 99% (2017). The increase in score

can be attributed to the concerted effort made by the divisions to develop the necessary procedures and to embed ECS system requirements in the manner in which they do business. The focus for the FY 2018 ECS external audit will be on both environmental control system compliance and legislative compliance.

We continue to maintain constructive relations with all regulatory authorities, to ensure that we respond appropriately to regulatory developments influencing the delivery of our strategic objectives. Regulatory developments relating to climate change, resource use and environmental management are reviewed on our website. A legal assessment is scheduled for 2018.

In committing to sustainable resource use and a reduced impact on the environment, we have set specific targets for energy and water efficiency and consumption, and the management of water and waste across the group. The table below provides an overview of our medium-term targets, their alignment with the South African National Development Plan (NDP) and the United Nations Sustainable Development Goals (SDGs). It also elucidates our performance against these targets.

NDP / SDG supported	Key performance area	Target	Target date	2017 performance against targets
SDGs: 13, 12	GHG Emissions (Scope 1 and 2)	2,5% product GHG emission intensity reduction year-on-year from 2016 to 2018	Sept 2017 Sept 2018	1% GHG emission intensity reduction in land based Facilities 11% decrease in GHG emission intensity reduction in vessels
		Develop and implement science based GHG reduction targets	2020	Within target range.
SDGs: 12, 13	Energy	2,5% product energy intensity reduction year-on-year	Sept 2017 Sept 2018	1% increase in product energy intensity
		2,5% electricity per unit area intensity reduction year-on-year by Oceana Group Corporate Office	Sept 2017 Sept 2018	11% increase in electricity per unity area intensity.

NDP / SDG supported	Key performance area	Target	Target date	2017 performance against targets
SDGs: 6,14,12	Water usage and disposal	5% -10% product water usage intensity reduction from base year	Sept 2020	Achieved a 17% absolute water consumption reduction.
SDGs: 15,12	Waste disposal	Zero waste that is fit for human consumption directed to landfill	2020	Within target range.
	Promoting food security	Contribute to ensuring the transition of red listed commercial fish species to an orange listing and to transition orange listed commercial fish species to green listed.	2020	89% of our targeted commercial fishing rights on the SASSI green list.
		All our targeted wild-caught fish resources will be sourced from fisheries that are undertaking an industry and DAFF approved credible, time-bound improvement project where they are not WWF-SASSI green-listed, or caught from MSC (or equivalent) certified fisheries.	2025	89% of our targeted commercial fishing rights on the SASSI green list. Our hake operation once again retained its Marine Stewardship Council (“MSC”) chain of custody certification, considered the world’s most rigorous eco-labelling initiative for fishing. Oceana’s five fishmeal operations also retained their certification in terms of the International Fishmeal and Fish Oil Organisation Global Standard for Responsible Supply (IFFO-RS).

Table 5: Medium-term targets overview

Monitoring, mitigating and managing our environmental impacts is a priority of our sustainable development practices, with the emphasis on promoting the efficient use of resources. Our reliance on renewable ecosystems necessitates that we make a positive contribution to the

sustainability of the fishing industry which can be negatively influenced by unsustainable resource use practices. Our approach aims to contribute towards environmentally sustainable national development and policies.

We have participated in CDP: Climate Change (formally known as the Carbon Disclosure Project) for seven consecutive years and achieved year-on-year improvements to our disclosure score. With reference to our climate change disclosure and performance score we received a B rating (Management Level), which is in line with the South African average and higher than the Consumer Staples sector average. Oceana received a Management level score in this section as we had set medium term targets, tracking our progress against goals and have implemented emissions reduction processes at our plants. . To reach Leadership status, we will need to get the targets verified by the science based Target initiative.

Anticipated changes in climate will have both direct and indirect impacts on Oceana. Oceana reliance on natural resources (fish stock biomass), and exposure to the impact of natural weather events affects both production and working conditions at sea. To be resilient, we need to increase our ability to adapt to changes in the fish stock biomass and to a greater volatility in climatic conditions. Oceana’s progress on the adaptation management plan is reviewed below.

RISK AREA ADAPTATION MEASURES IMPLEMENTED	2017 ADAPTATION MEASURES UPDATE
Resource Diversifying the resource access variability	<p>Oceana further increased its local production capacity of canned pilchards, importing additional product for canning locally.</p> <p>The South African Government approved experimental fishing in its territory. Monitored the impact of experiential fishing and provided requisite information to DAFF.</p> <p>Continual engagement and participation in DAFF scientific working groups.</p> <p>Annual appointment of independent resource status researcher.</p>
Water supply Water reduction and resilience plan	<p>Development of water reduction and resilience plan for each division.</p> <p>Implementation of a 30% potable water reduction target in the short-term.</p>

Energy reduction targets Reporting and monitoring energy and cost consumption Back-up generators at high risk facilities	Refer to page 18 of our Sustainability Report 2017 for a reflection of our performance against the energy reduction targets Overhauling two vessel engines, resulting in improved fuel efficiency
Business Risk management interruption	Group Business Continuity Plan including IT disaster recovery plan is in place Formal business continuity plans for land-based facilities in final development stage, which take into account scenario planning.
Communities - Corporate social responsibility programme which focuses on the needs of the communities in which we operate	Please refer to pages 41 to 45 of our 2017 Sustainability Report for a description of our impact on the communities in which we operate.

Table 6: Climate Change adaption progress

Oceana Group’s top ten environmental risks encompass the environmental risks detailed in the WWF and World Economic Forum Risk Report of 2017. The Oceana Group environmental risks and progress with mitigation measures are assessed quarterly. We are confident that the risks identified are suitably managed and a recent assessment indicated that the risks identified as well as the ranking system is in line with the international practice.

The group’s policy and management practice is to use water as sparingly and efficiently as possible in production, cleaning and domestic applications. In response to the drought conditions in the Western Cape, we have developed and are implementing action plans aimed at reducing the use of potable water by 30% in the near term. This includes investigating opportunities for alternative water sources, an increased focus on improving water use efficiency, water augmentation and substituting potable water with sea water (where possible). This year, our water usage per unit of activity was 1.08 kl per ton of product produced or stored and handled (2016: 1.06 kl). Our absolute water consumption was reduced by 17% when compared to the FY 2016 consumption data.

From a waste management perspective, we have continued to separate and process waste through onsite balers at the Lucky Star St Helena Bay and Amawandle Pelagic cannery and fishmeal plant facilities. Specialist contractors remove and recycle the waste oils, plastics, paper cartons and coal ash in accordance with applicable agreements. CCS Logistics conducts in-house sorting of their solid waste. An external waste management company is engaged to sort and

recycle waste at all of their South African cold stores. The cold stores recycle scrap metal, carton rolls, paper and used lubrication oil.

89 % of our targeted South African commercial fishing rights, by volume, are on the South African Sustainable Seafood Initiative (SASSI) green list. The year has seen the orange listing of Pilchards and Horse Mackerel, and the red-listing of West Coast Rock Lobster. West Coast Rock lobster has been red-listed due to a decline in the population. Horse Mackerel was moved to the orange category in May 2017 due to uncertainty regarding its stock status and concerns around the management of the fishery.

SOUTH AFRICAN COMMERCIAL FISHING RIGHTS	%	SASSI CATEGORY
Anchovy	84	
Pilchard	7	
Deep sea hake	4	
Horse mackerel	4	
West Coast rock lobster	0.3	
Squid	0.1	
South Coast rock lobster	0.01	
Total	100	

4.5 Continual Improvement Commitment

In 2018 we intend to continue to focus on the application of our existing policies and procedures across the group, in particular in our Angolan operations.

In addition, areas for improvement and action include water and waste management and reporting as well as the management of our biodiversity impacts.

5 ANTI-CORRUPTION

5.1 Global Compact Principles

Principle 10

Businesses should work against all forms of corruption, including extortion and bribery.

5.2 Relevant GRI Indicators:

- Management Approach is described in the GRI Table
- GRI 4

5.3 Measurement of Outcome

The 2017 self-assessment resulted in a compliance score of 91% with the anti-corruption UNGC requirements.

All employees are required to observe the highest ethical standards in conducting the group's business.

Directors and employees are required to observe the highest ethical standards in conducting the group's business. In this regard, the group has a formal code of business conduct and ethics. An anonymous and secure whistle-blowing facility has been in place for many years. Its purpose and anonymity are emphasised at employee induction and training sessions. The facility is also available in Namibia and the United States. In the current reporting period, as at end September 2017 a total of 39 calls were received, of which 17 were wrong numbers; 17 were queries regarding the purpose of the line, 3 were unrelated to Oceana and 5 were anonymous reports. The 5 reportable incidents were investigated and there was deemed to have no substance to the allegations.

5.3.1 Assessments, policy and goals

Oceana is committed to building trusted relationships with all key stakeholders. The board and management are responsible for ensuring the sustainability of the business by having a clear strategy in place and demonstrating a visible commitment to ethical behaviour and good corporate governance within its operations. Policies, procedures and internal controls are geared towards entrenching ethical practices throughout the group.

The following policies are in place and have been communicated to employees:

- Human Rights policy and statement
- Corporate Compliance policy
- Anti-bribery and Corruption Policy

- Global Anti-corruption and Bribery policy (supplement to the Anti-bribery and Corruption policy)
- Supplier Code of Conduct
- Business Code of Conduct and Ethics
- Fraud Policy

The group's code of business conduct and ethics is distributed to all new employees upon joining the group and there are regular refresher sessions that addresses the key topics covered by the code. The group also subscribes to online compliance training for its employees in a module covering Business Conduct and Ethics. The supplier code of conduct, which includes a commitment to the prohibition of corruption and bribery, is signed by all existing and new suppliers.

Oceana's Anti-bribery and Corruption Policy is applicable to the Oceana Group, including all its subsidiaries as well as entities over which it is able to exercise effective control. The policy has been communicated to all subsidiaries and entities over which we exercise effective control, including all directors, employees and authorised representatives.

Oceana subscribes to online compliance training for nominated employees; and Anti-bribery and Corruption is one of the training modules. Directors and employees are required to observe the highest ethical standards in conducting the group's business. In this regard, the group has a formal Code of Business Conduct and Ethics.

5.3.2 Continual Improvement Commitment

Oceana will continue its efforts to combat corruption and bribery as stipulated in the measurement of outcomes above.

The focus areas for continual improvement include anti-corruption risk assessments, increased and improved awareness on the Oceana anti-corruption policy and commitment and ensuring that our anti-corruption policy is communicated throughout our supply chain.

15 December 2017