

# UNITED NATIONS GLOBAL COMPACT

## COMMUNICATION ON PROGRESS

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17 December 2016

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.



## Table of Contents

1	Introduction .....	4
1.1	UNGC self-assessment .....	6
1.1.1	Assessment methodology .....	6
2	Human Rights .....	7
2.1	Applicable Global Compact Principles: .....	7
2.2	Relevant GRI Indicators .....	7
2.3	Measurement of Outcomes .....	7
2.3.1	Human Rights .....	7
2.3.2	Occupational Health & Safety .....	8
2.4	Continual Improvement Commitment .....	9
2.4.1	Human Rights .....	9
3	Labour .....	11
3.1	Global Compact Principles .....	11
3.2	Relevant GRI Indicators .....	11
3.3	Measurement of Outcomes .....	11
3.3.1	Policy and Procedures .....	12
3.3.2	Union membership .....	12
3.3.3	Skills development .....	13
3.4	Continual Improvement Commitment .....	14
4	Environment .....	16
4.1	Global Compact Principles .....	16
4.2	Relevant GRI Indicators .....	16
4.3	Measurement of Outcome .....	16
4.3.1	Assessments, policy and goals .....	16
4.4	Continual Improvement Commitment .....	20

5	Anti-Corruption.....	22
5.1	Global Compact Principles .....	22
5.2	Relevant GRI Indicators:.....	22
5.3	Measurement of Outcome .....	22
5.3.1	Assessments, policy and goals .....	22
5.3.2	Continual Improvement Commitment.....	23

## 1 INTRODUCTION

The Oceana group of companies (“Oceana”) is committed to the principle of turning fishing rights into shared value for all our stakeholders. Giving effect to this core purpose inspires our people and our actions. It is also a challenge that requires our ongoing engagement in the contested ocean economy. Therefore our dependence on living marine resources also requires us to develop and sustain strong relationships with local coastal communities where we conduct our operations from.

Oceana has identified the material Environmental, Social and Governance (“ESG”) risks that influences our ability to create value for ours stakeholders. The material risks identified include:

- Resource availability and ability to harvest
- Allocation of fishing rights
- Food safety
- Scarcity of critical skills/succession planning
- Legislative non-compliance
- Business interruption/Industrial action

The progress on initiatives, policies and programs, geared to managing our material risks are unpacked in the Communication on Progress report. In addition to addressing environmental, social and governance (ESG) risks, Oceana’s sustainability strategy addresses opportunities to empower people through training, equity and remuneration; the reduction of costs through enhancing environmental efficiencies; enterprise development in helping smaller enterprises to grow into sustainable businesses; and support for the sustainable development of vulnerable coastal communities.

The ocean economy presents a dynamic blend of risk and opportunity, potential conflict and collaboration, and continual change. Navigating this operational landscape requires us to be open to new thinking, flexibility, partnerships and a relentless drive to optimise our operations. These elements are core to our business and intrinsic to our continued delivery of societal value.

This year saw us aligning our value creation objective with Sustainable Development Goals. The infographic below, reflects the Sustainable Development Goals (SDG’s) aligned to our core business strategy. We are actively contributing to the realisation of these goals.



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

The past year has delivered learning and seen progress in several areas, all of which form the building blocks for a more ambitious strategy. These areas include:

- meeting regulatory requirements across multiple geographies;
- measuring social and environmental data;
- enhancing training and skills development;
- meeting global best practice standards, such as ISO 14001; and
- piloting shared value initiatives, such as empowering rural entrepreneurs in an innovative retail development initiative.

Our drive to turn fishing rights into shared value is a driver of innovation within the group; by formalising this in a clear strategic framework, we are increasingly in a position to leverage these gains.

This report presents progress made with our implementation of the UNGC principles and reflects the success of our strategy on various initiatives that are enhancing local production, increasing employment and meeting the growing demands 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

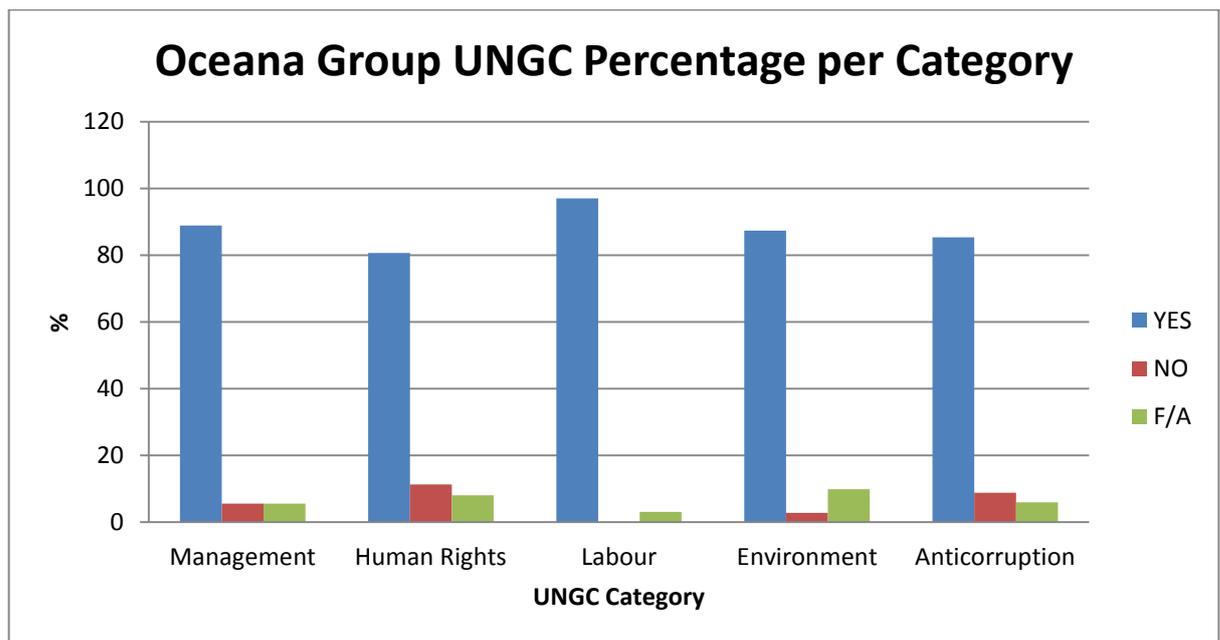
In 2016, we undertook an assessment of our compliance in terms of the Global Compact Self-Assessment Tool. The table below reflects our compliance with the five main sustainability categories; namely, management, human rights, environment, anti-corruption and labour.

Based on the findings of the UN assessment tool, we are implementing a plan of continuous improvement.

### 1.1.1 Assessment methodology

The UNGC self-assessment was undertaken by a UNGC working group consisting of representatives from Oceana’s human resources, environmental sustainability, supply chain and compliance departments. Together this team assessed our compliance with the requirements of the assessment tool, identified actions for closure, a responsible person and timeframe.

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



**Table 1:** Oceana Group 2016 UNGC Self-Assessment Results

## 2 HUMAN RIGHTS

### 2.1 Applicable Global Compact Principles:

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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, 2016
- GRI G4

### 2.3 Measurement of Outcomes

In the 2016 UNGC compliance self assessment a compliance score of 89% was achieved.

#### 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 included 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 is aimed at promoting equality of opportunity and combating discrimination. The policy is applied across all our operations in Angola, Namibia, South Africa and the United States. The policy commits us to striving for full compliance with applicable legislation in the countries in which we operate, as well as to implementing 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. Our Human Rights policy is distributed to all new employees and regular staff refresher sessions address key issues contained therein. All employees are required to observe the highest ethical standards in conducting the group's business. A customised programme was launched in 2013 to introduce the policy across all our operations.

In 2016, we updated our Human Rights Policy and Statement to reflect our commitment to our employees, stakeholders and the local communities within which we operate. In addition, the revised policy speaks to our commitment to ensuring compliance with to stipulated policies throughout our supply chain. More specifically, the Supplier Code of Conduct was amended in

2016 to reflect our commitment to the prohibition of forced labour as well as fair and reasonable terms of employment for the employees of our suppliers.

The policy is being applied across all our operations in South Africa, Namibia, Angola and the USA. Oceana is committed to developing an organisational culture which supports internationally recognised human rights and seeks to avoid participation in human rights abuses.

In preparation for anticipated legislation on minimum wages in South Africa, Oceana undertook an investigation into all our wage levels. We found that our lowest wage level category were well above any of the proposed minimum wage levels.

### **2.3.2 Occupational Health & Safety**

Managing directors of all the operating divisions are responsible for ensuring full compliance with relevant occupational health and safety legislation and that the required structures for ensuring this are in place. Recognition agreements with the recognised unions in our main operating divisions, Lucky Star and BCP explicitly address health and safety issues.

We have implemented a safety management system (SMS), on our vessels which provide a formal documented system of policies, procedures and records developed for the operator of a particular vessel focused on the management of risk (both identification and controls) in relation to operational safety. This is as prescribed in the Maritime Occupational Safety Regulations.

In order to ensure compliance with formally documented and implemented systems and relevant legislation, we annually undertake health and safety audits at sites and vessels, as well as effective safety monitoring, training and enforcement programmes. The 2016 Health and Safety independent audit scores are reflected below.

COMPANY – Sea based	HEALTH AND SAFETY SORE (%)
Calamari Fishing – Squid fleet	97
BCP – Hake fleet	94
Lucky Star – Pelagic fleet	98
Oceana lobster – Lobster fleet	96
Amawandle - Pelagic fleet	96
COMPANY – Land based	HEALTH AND SAFETY SORE (%)
Oceana House CPT (1 site)	96
CCS Logistics (8 sites) - average	99
Oceana Lobster ( 3 sites) - average	98
Lucky Star (2 sites) - average	96
Amawandle Pelagic	88

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

The group’s Disabling Injuries Frequency Rate (“DIFR”) for 2016 was 0.9 (2015: 0.5). Although there has been an increase in this year’s DIFR it is well below the group’s DIFR ceiling of 2.0. We have initiated a strategy to enhance the health and safety awareness which specifically addresses this issue includes training, monthly internal audits and spot fines.

We offer our employees access to onsite occupational health practitioners, medical insurance, as well as an Employee Wellness Assistance Programme (“EAP”), which has now been rolled out to all our 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 responded 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.

## 2.4 Continual Improvement Commitment

### 2.4.1 Human Rights

Based on the self-assessment undertaken, the areas which require specific attention are the management of the contracted security services and the human rights compliance within our supply chain.

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

- Developing procedures which detail the requirements for Personal Protective Equipment (“PPE”) access and utilisation. Although PPE are worn throughout the

operations (where applicable), there is no documented procedure which guides the PPE access and utilisation.

- Developing and implementing an overtime management action plan and reporting on it monthly to Exco.
- Developing a programme and action plan for audit the key suppliers' compliance with the Oceana Supplier Code of Conduct.

### 3 LABOUR

Our 2016 compliance assessment revealed 97% compliance in South Africa and Namibia, with the labour related UNGC principles.

#### 3.1 Global Compact Principles

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

#### 3.2 Relevant GRI Indicators

- Management Approach as described in the GRI table, 2016
- GRI G4

#### 3.3 Measurement of Outcomes

We remain one of very few companies in the industry that provides minimum guaranteed working hours to our seasonal employees in what is a very cyclical business. Through a change in fish processing strategy in the 2016 year, the group has managed to provide a more stable employment and incomes to our seasonally employees. The management and use of temporary labour remains an important focus. In line with regulatory requirements we continue to reduce our reliance on labour brokers and have in this year converted 61 employees from non-permanent to permanent employees. We continue to work with our unions to ensure the further conversion of seasonal employees.

S Oceana has since 2014 created more than 300 weeks of additional employment in our canneries for seasonal employees. This has ensured year-round employment for seasonal staff who are now not only paid a basic wage, but also enjoy the benefits of overtime pay, pension fund contributions and seasonal and production bonuses.

### **3.3.1 Policy and Procedures**

Oceana adheres to all applicable labour legislation within the countries in which we operate. The group does not permit child labour nor does it permit forced or compulsory labour. The commitment to ensure that no child labour is permitted is being progressively communicated to our supplies and those we engaged to date have all signed the Supplier Code of Conduct. The supplier Coe of Conduct has been included in our 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:

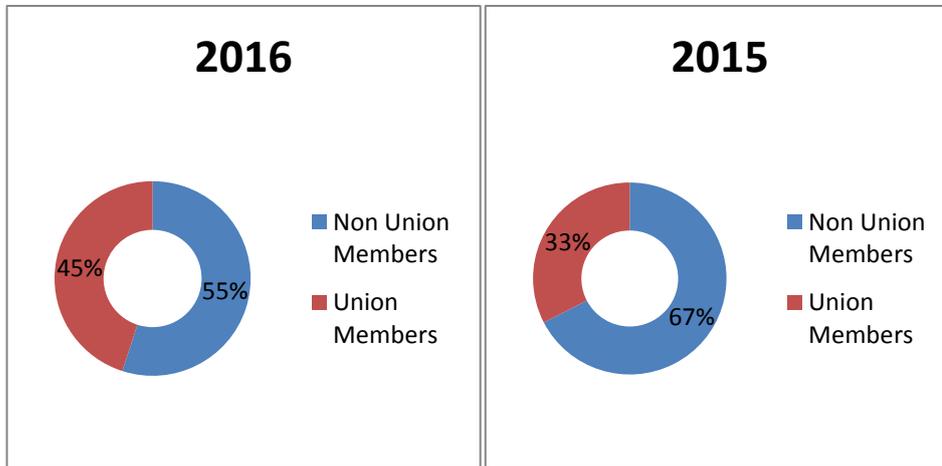
South Africa:

- 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



**Figure 2:** Union membership comparison

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

### 3.3.3 Skills development

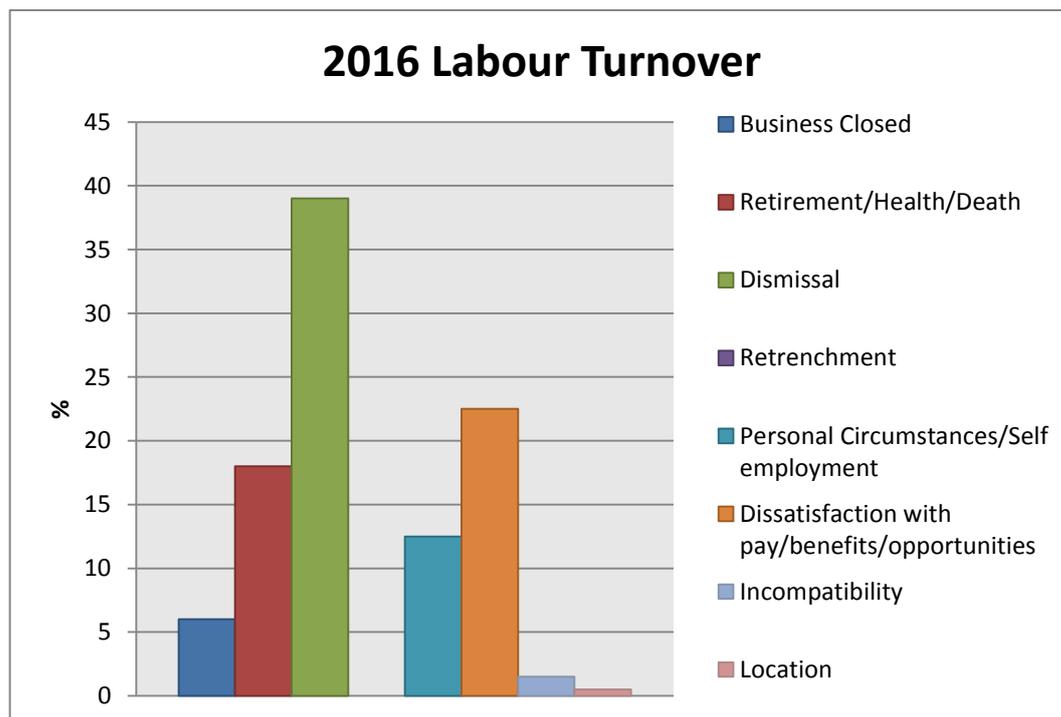
The scarcity of skills remains a key risk and challenge in the business. This year we increased the number of people on skills programmes in the form of learnerships, apprenticeships, and graduate internships. Our skills development investment initiatives are geared to enhancing individual and business performance, ensuring business continuity and accelerating workforce transformation. Our skills programmes are specifically focused on building scarce and critical skills in the areas of marine science; vessel crew; artisans; engineering; supply chain; food safety, quality and processing; IT and finance. Through structured workforce and succession planning we continue to develop young talent to ensure a strong pipeline of the skills required to meet our business requirements.

TRAINING SPEND - SA and Namibia	2016	2015
Total amount invested in Skills Development	R 33.4 mil	R 17.8 mil
Total spent as a % of leviabale payroll on Black Employees (South Africa)	3.71%	2.51%
Total spent on Black Employees as a % of Total Amount invested in Skills Development	87%	94.8%
Total spent on Disabled Employees as a % of Total Amount Invested in Skills Development	7.87%	
Total spent as a % of leviabale payroll on Black Disabled Employees	0.34%	

(South Africa)		
<b>TRAINING SPEND - Daybrook</b>		
Training Spent Daybrook	\$18,923.00.	

**Table 3:** 2016 Skill Spend

We continue to maintain proactively engage with and have and positive relations with our employees and union representatives at all levels. This is indicated by the relatively low annual voluntary labour turnover rate of 5.59% (2015: 3.7%) and there have been no days lost due to industrial action during the past six years.



**Figure 3:** 2016 Labour turnover percentages per category

### 3.4 Continual Improvement Commitment

In the 2017 financial year we will be looking to partner with leading South African and international business schools to deliver customised leadership development programmes at appropriate levels.

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

The 2017 we intend to focus on the application of our existing policies and procedures across the group, in particular to our Angolan and Daybrook operations.

## 4 ENVIRONMENT

The 2016 compliance assessment revealed an 87% compliance with the requirements of the environment component on the UNGC.

### 4.1 Global Compact Principles

<b>Principle 7</b>	<b>Businesses should support a precautionary approach to environmental challenges</b>
<b>Principle 8</b>	Undertake initiatives to promote greater environmental responsibility
<b>Principle 9</b>	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

#### 4.3.1 Assessments, policy and goals

The Group's environmental policy articulates our commitment to complying with legislation and regulations on the environment. It also provides the guiding principles to our commitment to managing and mitigating our environment impacts. The management of our environmental impacts is founded on the ISO 14001 aligned environmental control system (ECS). This system provides for the identification, monitoring and control of priority environmental risks identified by the group. We continue to consolidate our ECS and embed its requirements into the organisation's culture. The ECS system is to be extended to our Angolan and American operations.

Environmental compliance includes external ECS compliance audits to address system compliance as well as compliance with applicable legal frameworks. Our compliance drive has included the engagement of management in internal audit processes and the provision of environmental training for relevant staff.

The ECS compliance target for 2016 required an overall average score of 90% and a minimum score of 65% for each element in the audit.

- Land-based facilities: nine Oceana land-based facilities were audited in the 2016 year. All divisions met the minimum target for the overall score as well as the minimum individual element requirements for each of the components. The group achieved a score of 97% (2015: 95%).
- Sea-based facilities: one lobster vessel, one small pelagic vessel, three hake vessels and one horse mackerel vessel were audited. The average score was 96% (2015: 96%).

A review of the group's structures to address noncompliance with policies and our compliance performance is provided on our website [www.oceana.co.za](http://www.oceana.co.za). We will be establishing a compliance committee together with compliance systems and processes in 2017.

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

KEY PERFORMANCE AREA	TARGET	TARGET DATE	2016 PERFORMANCE AGAINST TARGETS	STATUS
<b>REPORTING</b>	Annual public reporting against targets	DEC 2014	Our compliance against targets is reflected annually in the Sustainable Development and Integrated Reports	
 <b>GHG EMISSIONS (SCOPE 1 AND 2)</b>	5% product GHG emission intensity reduction from base year (2013)	SEPT 2016	44% intensity reductions in landbased facilities*	
			7% increase in emission intensity on vessels	
	Further 2.5% product GHG emission intensity reduction year-on-year from 2016 to 2018	SEPT 2017 – SEPT 2018	Within target timeframe range	
 <b>ENERGY</b>	5% product energy intensity reduction from base year (2013)	SEPT 2016	20% increase in product energy intensity (landbased facilities and vessels)*	
	Further 2.5% product energy intensity reduction year-on-year	SEPT 2017 – SEPT 2018	Within target timeframe range	
	5% electricity per unit area intensity reduction from base year (2013) by Oceana Group Corporate Office	SEPT 2016	12% decrease in electricity per unit area	
	Further 2.5% electricity per unit area intensity reduction year-on-year by Oceana Group Corporate Office	SEPT 2017 – SEPT 2018	Within target timeframe range	
 <b>WATER USAGE AND DISPOSAL</b>	2.5% product water usage intensity reduction from base year (2013)	SEPT 2016	4% decrease in the product water intensity from 2013*	
	Measurement and reporting of quantity and quality of effluent	SEPT 2017	The target date was amended to allow for the additional effluent monitoring which would be required with the advent of the Coastal Water Discharge Permits	
 <b>WASTE DISPOSAL</b>	Ensure that no food that is fit to eat (by humans or animals) is sent to landfills	ANNUAL	Compliance against our targets is reflected annually in our Sustainable Development Report	
	Measurement and reporting of quantity and type of waste	SEPT 2015		

\* Excludes Daybrook

Monitoring, mitigation and managing our environmental impacts is a priority sustainable development practice, with the emphasis placed on promoting the efficient use of resources. Our reliance on a renewable ecosystem 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 sustainable national development policies.

We have participated in the CDP (formally known as the Carbon Disclosure Project) for seven consecutive years and achieved year-on-year improvements to our disclosure score. In 2015, the Oceana disclosure score of 98% and a “B” performance score were well above the industry average of 91% for disclosure and “C” for performance as well as the average CDP programme score of 84% for disclosure and “C” for performance. This year saw the introduction of a new approach to scoring. Participants were rated on a score of A through to D-, according to a rating criterion, which reflects the four levels of environmental stewardship, namely: disclosure, awareness, management and leadership. Oceana was awarded an overall performance score of A-.

This year we undertook an audit to determine whether the environmental risk identified takes into account:

- divisional,
- national, and
- international environmental risks/ impacts

In doing so an assessment was undertaken of the World Economic Forum – Global Risk Report (2015), the IRMSA South African Risk Report (2015) and the WWF SA Environmental Risks report (2014).

Oceana’s top ten environmental risks encompass the environmental risks detailed in the WWF and WEF reports. Other than water access, no environmental risks were noted in the top ten risks identified in the IRMSA report (a South Africa specific risk assessment, related to economic, social and governance risks).

The group’s policy and management practice is to use water as sparingly and efficiently as possible in production, cleaning and domestic applications. This year our water usage per unit of activity was 1.06 kl per ton of product produced or stored and handled (2015: 1.10 kl). We therefore achieved a 4% reduction in our water intensity reduction when compared to the 2015 intensity usage.

Oceana partnered and funded initiatives in association with the Responsible Fishing Alliance (“RFA”) and the World Wildlife Fund (“WWF”). The RFA provides a platform for collaborative research and mitigation efforts. Highlights in 2016 include: alerting government to the dangers of bulk sediment mining; a socio-economic assessment of the fishing industry and initiatives to prevent accidental seabird mortalities on hake vessels. To promote the sustainable use of fish resources we have continued our engagements with industry stakeholders and continue to partner with government and communities to promote an ecosystems approach to fishing (EAF).

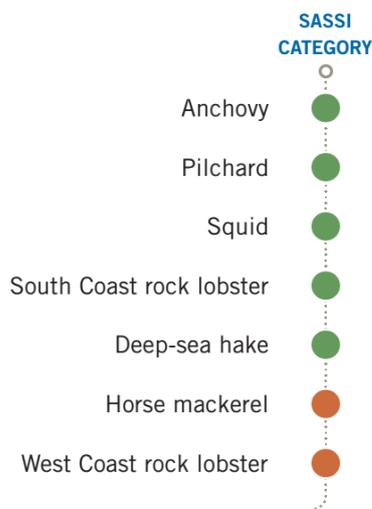
Since 2011 we have trained almost 300 seafaring employees, accounting for 53% of all employees on board our vessels on responsible fishing practises and EAF. Cumulatively, 1 400 seafaring employees of the RFA’s members have been trained to date. Oceana is considered the industry leader in terms of the number of seafaring employees trained on responsible fishing practices and EAF.

Oceana is an active member of the RFA and WWF-SA partnership. The partnership has been responsible for the improved management of twelve non-target fish species that are caught alongside Hake in the deep-sea trawl fishery. SADSTIA, of which Oceana is a member, and WWF-SA have also agreed to work together to implement a three-year South African offshore trawl By- Catch Fishery Conservation Project (“FCP”).

All of our targeted commercial fishing rights are on the South African Sustainable Seafood Initiative (SASSI) list. Other than West Coast Rock Lobster and Horse Mackerel, all fall within the green category of the SASSI list and are thus considered to be the most sustainable seafood choices, from the healthiest and most well-managed fish populations, capable of sustaining current fishing pressure.

Rock lobster may be red-listed due to a decline in the population. Horse Mackerel was moved to the orange category in May 2016 due to uncertainty regarding its stock status and concerns around the management of the fishery.

## SOUTH AFRICAN COMMERCIAL FISHING RIGHT



### 4.4 Continual Improvement Commitment

The 2017 we intend to focus on the application of our existing policies and procedures across the group, in particular to our Angolan and American operations.

In addition, we have established long-term goals aimed at reducing our ecological footprint and promoting food security.

LONG-TERM GOALS

We have identified the following 2020 long-term goals in line with group strategy and our leadership role within the South African fishing community.

**Reducing our footprint:**

- ➔ • Zero waste that is fit to eat (by humans or animals) to landfill.
- ➔ • Water reduction and reuse target of 5 – 10% water usage intensity reduction from a 2016 baseline.
- ➔ • Reuse 20 – 40% of effluent water in the processing plant or alternatives.
- ➔ • Develop and implement science-based GHG reduction targets.

**Promoting food security:**

- ➔ • All our targeted wild-caught fish resources will be sourced from fisheries that are either undertaking a credible, time-bound improvement project, are WWF-SASSI green-listed, or caught from MSC (or equivalent) certified fisheries.
- ➔ • Contribute to ensuring the transition of red-listed commercial fish species to an orange listing and to transitioning orange-listed commercial fish species to green-listed.

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

We will, in 2017 attend on the provision of a detailed climate change strategy, including the development of science based targets.

## 5 ANTI-CORRUPTION

The 2016 self assessment resulted in a compliance score of 85% with the anti-corruption UNGC requirements.

### 5.1 Global Compact Principles

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#### Principle 10

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

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### 5.2 Relevant GRI Indicators:

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

### 5.3 Measurement of Outcome

All employees are required to observe the highest ethical standards in conducting the group's business. A customised programme was launched in 2013 to implement the policy across the business. During this reporting cycle, 65 employees received training on anti-bribery and corruption.

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. In the current reporting period, as at end August 2016 a total of nine calls were received, five of which were wrong numbers; two were queries regarding the purpose of the line; and another two were unrelated to Oceana.

#### 5.3.1 Assessments, policy and goals

Oceana is committed to building trusted relationship 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 in 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 on joining the group and there are regular refresher sessions that addresses the key concerns covered by the Code. The group also subscribes to online compliance training for its employees on a module covering Business Conduct and Ethics.

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. Forty nine new employees completed training on the code of conduct and thirty two new employees are currently in training.

Whistle Blower is an independent information gathering company, which offers an anonymous and secure platform for whistleblowing. Toll-free numbers are available in both South Africa and Namibia for purposes of reporting any known or suspect inappropriate practices. This facility is available to employees, contractors, suppliers, customers and the public to report illicit and or illegal activity without fear of reprisals or repercussions to the whistle blower.

A roll out of awareness posters was undertaken in September and October 2016 on all Oceana sites and vessels. This will serve to remind all staff that the facility is available.

In the current reporting period, as at end August 2016 a total of nine calls were received, of which five were wrong numbers; two were queries regarding the purpose of the line; and two were unrelated to Oceana.

### **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 continuous improvement include anti-corruption risk assessments, increased and improved awareness of Oceana's anti-corruption policy and a commitment to ensuring that our anti-corruption policy is communicated throughout our supply chain.

17 December 2016