

2013

SHARED VALUE



OCEANA GROUP

Oceana Group Limited Global Reporting Initiative III 2013

GLOBAL REPORTING INITIATIVE (GRI) III

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Strategy and analysis				
	CEO statement about the relevance of sustainability to the organisations and its strategy	1.1		See Comments from the CEO , page 7 and Chief Executive Officer's Report on page 6 of the Integrated Report (IR)
	Description of key impacts, risks and opportunities	1.2		Business risk has been assessed as part of the enterprise-wide risk identification and management system , pages 2-3 Strategic focus areas are highlighted on page 8. Further information on material risks can be found on page 22 of the IR
Organisational profile				
	Name of the organisation	2.1		Oceana Group. See About this report , page 1
	Primary brands, products and/or services	2.2		Oceana's fishing business consists of canned fish, fishmeal, fish oil, lobster, horse mackerel, squid and hake. Oceana also operates a cold storage business and a French fry business. See Group at a Glance , pages 12-15 of the IR
	Operational structure of the organisation	2.3		The group's key divisions are Lucky Star, Blue Continent Products, Oceana Lobster, Calamari Fishing, Lamberts Bay Foods and Commercial Cold Storage. See Group at a Glance , pages 12-15 of the IR
	Location of the organisation's headquarters	2.4		Oceana House, 25 Jan Smuts Street, Foreshore, Cape Town
	Number of countries where the organisation operates	2.5		Oceana has operations in South Africa and Namibia. See Group at a Glance , pages 12-15 and inside front cover of the IR
	Nature of ownership and legal form	2.6		Oceana Group was incorporated in 1918 and is listed on the Johannesburg and Namibian Stock Exchanges. See Group Profile page 1 and Group at a Glance , pages 12-15 of the IR
	Markets served	2.7		Oceana Group markets their products globally. See Group at a Glance , pages 12-15 of the IR
	Scale – Including: Number of employees, number of operations, net sales, total capitalisation broken down in terms of debt and equity; and quantity of products or services provided. Total assets, beneficial ownership (including identity and percentage share of largest shareholder). Breakdown by country/region of: sales/ revenues, costs and employees	2.8		See The Year in Numbers , pages 2-3 of the IR Group at a Glance , pages 12-15 of the IR How We Shared Value , page 20-21 of the IR Operational Reviews, pages 38, 46, 52 and 58 of the IR (Canned fish and fishmeal ; Horse mackerel and hake ; Lobster, squid and French fries ; CCS Logistics ; Human resources ; Group strategic services); Condensed Group Financial Statements , page 109 of the IR
	Significant changes during the reporting period	2.9		See About this Report
	Awards received in the reporting period	2.10		
REPORT PARAMETERS				
Report profile				
	Reporting period	3.1		This report covers the 12-month period ending 30 September 2013. See About this Report
	Date of most recent previous report	3.2		30 September 2013. See About this Report
	Reporting cycle	3.3		Annual. See About this Report
	Contact point	3.4		jillianm@oceana.co.za

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Report scope and boundary				
	Process for defining report content – Including: Determining materiality, prioritising topics within the report and identifying stakeholders the organisation expects to use in the report. Include explanation on how 'Guidance on defining report content' has been applied, associated principles and the Technical Protocol: 'Applying the Report Content Principles'	3.5		Oceana has assessed materiality as part of the enterprise-wide risk identification and management system. See Principle Risks , pages 2-5 Responding to Our Stakeholders , pages 24-25 of the IR Strategic Objectives, inside front flap of the IR
	Boundary of the report	3.6		See About this Report , inside front cover of IR
	Limitations	3.7		See About this Report , inside front cover of IR
	Basis for reporting on JVs	3.8		See About this Report , inside front cover of IR
	Data measurement techniques	3.9		Information reported is derived from the group's own internal records and from information in the public domain. See About this Report , inside front cover of IR Additionally, specific data is reported next to the relevant indicator or the reference to where this can be found in the IR or Sustainability report
	Explanation of effect of restatements	3.10		The carbon footprint was restated due to two vessels acquired at the end of F2013. The vessels' emissions and product volume were added to emission and product intensity calculation of F2009, base year.
	Significant changes	3.11		See About this Report
	GRI content index	3.12		This document, available on the Oceana website
Assurance				
	Assurance	3.13		See About this Report
Governance				
	Oceana's governance structure – including major committees under the board of directors who are responsible for setting strategy and for oversight of the organisation. The board's mandate, composition (including number of non-executive members), its committees, each individual's position and direct responsibility for economic, social and environmental performance. Percentage of individuals by gender within the board and its committees, broken down by age group and minority group and other indicators of diversity	4.1		Detail of the directorate See Governance, pages 84-107 of the IR, executive committee , page 90 of the IR and board committees , page 95 of the IR
	Nature of role of the Chair	4.2		The chairman, Mustaq Ahmed Brey is a non-executive director See Directorate , page 89 of the IR
	Board structure – state the number and gender of members that are independent and/or non-executive members. For unitary board structures, state how organisation defines 'independent' and 'non-executive'	4.3		Oceana Group has 11 directors, eight non-executives, four of whom are independent of whom two are females. Mr S Pather is the lead independent director. See Directorate , page 88 of the IR

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Governance				
	Mechanisms for shareholder direction and employee input	4.4		Oceana strives for meaningful stakeholder engagement, with the aim on mitigating risks and identifying opportunities. The executive committee has invested significant time in fostering good relations with government departments. See Responding to our Stakeholders pages 24-25 of the IR
	Linkage between compensation and performance	4.5		The remuneration and nominations committee considers compensation and performance of the board. See Remuneration , page 102 of the IR
	Processes for managing conflicts of interest	4.6		The directors and senior management are required to submit a list of other directorships and interests in contracts with Oceana. See Conflict of Interest , page 96 of the IR and Code of Business Conduct and Ethics , page 96
	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics. Include any consideration of gender or diversity	4.7		The remuneration and nominations committee uses the policy on selection and appointment of directors to review board members' qualifications, competence, gender, diversity and independence to establish the gaps before recruitment process is undertaken.
	Internally developed statements of mission or values, codes of conduct relevant to economic, social and environmental performance	4.8		See Sustainability Focus Areas , page 10 <ul style="list-style-type: none"> • Marine resource • Transformation and localisation • Food security and food safety • People (human resources and health and safety) • Environmental management • Communities and stakeholder engagement and Governance of Sustainability, pages 8-10
	Risk management procedures	4.9		The social, ethics and transformation committee has board oversight of sustainability. See Social, Ethics and Transformation , page 106 of the IR
	Performance evaluation processes	4.10		Formal evaluations of the performance of the board, its committees and individual directors were carried out during the year. Currently the board is not evaluated on its environmental/social/economic performance; however, appraisals do include these criteria. See Board Evaluation , page 96
Commitments to external initiatives				
	Explanation of how precautionary approach/principle is addressed by organisation	4.11		Oceana is committed to integrating the 10 principles of the Global Compact into the strategy. Principle 7 is the precautionary approach. See United Nations Global Compact , page 9
	Externally developed economic, environmental and social charters, principles or other initiatives	4.12		Oceana is committed to integrating the 10 principles of the Global Compact into the strategy. See United Nations Global Compact , page 9
	Membership in associations and/or advocacy organisations	4.13		See Group Strategic Services , pages 75-76 of the IR

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Stakeholder engagement				
	List of stakeholder groups (e.g. civil society, customers, local communities, including indigenous peoples, shareholders, suppliers, employees, trade unions)	4.14		See Responding to our Stakeholders , pages 24-25 of the IR
	Basis for identification and selection of stakeholders	4.15		See Stakeholder Engagement , pages 24-25
	Approaches to stakeholder engagement	4.16		See Stakeholder Engagement , pages 24-25
	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting Including views of indigenous people in specified countries, assessment of the significant issues raised by them, and the effectiveness of any action taken by the company to address the issues	4.17		See Stakeholder Engagement , pages 24-25
ECONOMIC				
Disclosure on management approach				
	Disclosure on management approach * Economic performance * Market presence, including local content (added value brought to the host nation, including workforce development and use of local services) * Indirect economic impacts * Reserves	EC: DMA		Economic performance is presented, see Condensed Group Financial Statements , page 110 of the IR , The Value Added Statement , page 4 of the IR How We Shared Value , pages 21-22 of the IR The status of fish stock is discussed in Focus Area One: Marine Resources on pages 10-11, and the scientific status of fish stocks is published on our website
Economic performance				
	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments Provide data on payment to government broken down by country and type	EC1	Core	See Value Added Statement , page 4 of the IR
	Financial implications and other risks and opportunities for the organisation's activities due to climate change	EC2	Core	Variation in availability of marine resources due to human action. See Focus Area 4: Environmental Management , page 19. Cost pressures due to climate change have not yet been quantified. We recognise extreme weather can cause damage to operations. Changes in ocean temperature could mean that fish stocks perish and operations would need to be relocated. Oceana commissioned a climate change adaption white paper at a cost of R94 000. Feasibility studies need to be completed to assess financial implications of refrigeration gas switches and trading of carbon credits from these projects. Further details can be found in our latest Carbon Footprint Report
	Coverage of the organisation's defined-benefit plan obligations	EC3	Core	See note 26, page 33 (Annual Financial Statements)
	Significant financial assistance received from government	EC4	Core	Not material

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Market presence				
	Range of ratios of standard entry-level wage compared to local minimum wage at significant locations of operation	EC5	Additional	All employees in the bargaining unit are paid in line with an agreement which includes minimum rates of pay. Currently we do not collect data; this will be done in the future.
	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation	EC6	Core	Expenditure with B-BBEE suppliers increased to R1,4 billion in 2013, from R1,1 billion in 2012. See Preferential Procurement , page 15
	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation	EC7	Core	Oceana is committed to the EE Act 55 and is committed to ongoing localisation regarding our hiring policies. See Focus Area 2: Transformation and localisation , pages 11-15.
Indirect economic impacts				
	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in kind or pro bono engagement	EC8	Core	The Oceana Foundation was launched in 2011 to consolidate the overall CSI expenditure by the group. See Focus Area 6: Communities and Stakeholder Relations , pages 34-40
	Understanding and describing significant indirect economic impacts, including the extent of impacts	EC9	Additional	See How We Shared Value in 2013 , pages 20-21 of the IR
ENVIRONMENTAL				
Disclosure on management approach				
	Disclosure on management approach: * Material, energy and water use * Biodiversity and land stewardship * Emissions, effluent and waste * Products and services	EN: DMA		See Focus Area 4: Environmental Management , pages 19-24
Materials				
	Materials used by weight or volume	EN1	Core	See Usage of Resources table on website
	Percentage of materials used that are recycled input materials	EN2	Core	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. The hake and can carton packaging material uses 15% recycled material.
Energy				
	Direct energy consumption by primary energy source	EN3	Core	See Carbon Footprint Assessment Report , Section 2.1 Direct Emissions
	Indirect energy consumption by primary energy source	EN4	Core	See Carbon Footprint Assessment Report , Section 2.2 Indirect Emissions
	Energy saved due to conservation and efficiency improvements	EN5	Additional	For 2013, please See Carbon Footprint Report, Appendix B , on our website
	Initiatives to provide energy-efficient or renewable energy-based products and services, and reductions in energy requirements as a result of these initiatives	EN6	Additional	For 2013, please See Carbon Footprint Report on our website
	Initiatives to reduce indirect energy consumption and reductions achieved	EN7	Additional	See Improving Energy Efficiency and Reducing Consumption of Non-Renewable Energy , page 20 See Carbon Footprint Report

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Water				
	Total water withdrawal by source	EN8	Core	Total municipal water usage was 934 186 kilolitres. See Water Management , page 24
	Water sources significantly affected by withdrawal of water	EN9	Additional	Currently all of Oceana's water is sourced from municipal supplies.
	Percentage and total volume of water recycled and reused	EN10	Additional	Currently Oceana does not measure this. See Waste Water , page 38
Biodiversity				
	Location and size of land owned, leased, managed in, or adjacent to, protected areas of high biodiversity value outside protected areas	EN11	Core	A lot 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 4,2871 ha in Lambert's Bay, 626,9157 ha in St Helena Bay, 4,4023 ha in Hout Bay and 0,464 ha in Humansdorp. 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 and 0,1438 ha in Elands Bay.
	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	EN12	Core	Oceana's environmental control system requires that an Environmental Management Plan (EMP) is in place. Our EMPs reflect the location of the operation and its impact on biodiversity. Scientific reports refer to an ecosystem approach to fishing to minimise impact on biodiversity. We consider each of our unique fisheries and scientific reports are commissioned on each, which are available on our website . We work both with the Department of Agriculture, Forestry and Fisheries and independent scientists funded by the industry itself.
	Habitats protected or restored	EN13	Additional	Oceana has limited impact on habitats. Where spillages occur, they are contained. Operations avoid interfering with nesting sea birds. At sea our hake vessels take measures to protect the sea bird population and has implemented our Bird Mitigation Plan. Oceana adheres to Marine Protected Areas as well as closed areas regulations. Oceana participates in all relevant scientific working groups to participate in habitat protection strategies.
	Strategies, current actions, and future plans for managing impacts on biodiversity	EN14	Additional	Oceana has a far bigger impact on the biodiversity of the ocean than on land. Reflecting this, Oceana is a member of the Responsible Fishing Alliance (RFA) and we partner with other organisations to implement best practice fishing methods. See Focus Area 1: Marine Resource , page 10
	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	EN15	Additional	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. See Leading Stewardship of Marine Resources , pages 74-76 of the IR. At sea, our by-catch is managed by our permits and we have a Bird Mitigation Plan.
Emissions, effluent and waste				
	Total direct and indirect greenhouse gas emissions by weight	EN16	Core	More detail can be found in our 2013 Carbon Disclosure Project (CDP) response available online at www.cdproject.net and in our most recent Carbon Footprint Report on our website
	Other relevant indirect greenhouse gas emissions by weight	EN17	Core	More detail can be found in our 2013 Carbon Disclosure Project (CDP) response available online at www.cdproject.net and in our most recent Carbon Footprint Report on our website

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Emissions, effluent and waste				
	Initiatives to reduce greenhouse gas emissions and reductions achieved	EN18	Additional	Oceana has set short-term, medium-term and long-term targets for GHG emissions reduction. See Key Performance Indicators , page 20. Further detail can be found in the 2013 CDP response available online at www.cdproject.net and in our most recent Carbon Footprint Report on our website
	Emissions of ozone-depleting substances by weight	EN19	Core	Oceana Freon emissions were 19 886 kg. See Carbon Footprint Report on our website
	NO, SO, and other significant air emissions by type and weight	EN20	Core	N ₂ O and CH ₄ emissions were 3 164 kg and 98 209 kg respectively. See Carbon Footprint Report . Currently we do not report on boiler stack emissions or odorous emissions.
	Total water discharge by quality and destination	EN21	Core	Currently we do not collect data. Where water is discharged into the ocean, it is tested by and results are sent to the Department of Water Affairs and Forestry.
	Total weight of waste by type and disposal method	EN22	Core	Total waste disposed was 454 tonnes of which 0,01 tonnes medical waste was sent to hazardous waste landfill and the rest of waste was sent to municipal landfills. See Waste Table , page 38
	Total number and volume of significant spills	EN23	Core	See Compliance , page 8. A spill at Lucky Star Hout Bay fishmeal factory was investigated and concluded that Oceana was not responsible for the spill. The authorities are investigating the root cause.
	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III and VIII, and percentage of transported waste shipped internationally	EN24	Additional	See EN22
	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff	EN25	Additional	Each operation discharges water in different ways. The St Helena Bay Water Quality Trust completed a benthic survey. Hout Bay discharges all water to the municipal sewers. Lamberts Bay French Fries plant has potential impact on the sea with the starch in effluent discharged into the sea. Walvis Bay has its own effluent plant.
Products and services				
	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	EN26	Core	Our Lucky Star cans, hake, horse mackerel and lobster packaging material has "please recycle" on the labels. From time to time we run marketing campaigns on how to re-use our products.
	Percentage of products sold and their packaging materials that are reclaimed by category	EN27	Core	54% by product weight of all Oceana product is exported and cannot be reclaimed. 65% of lobster sales in polystyrene boxes is recycled by the importers.
Compliance				
	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	EN28	Core	None reported. See Compliance , page 16
Transport				
	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce	EN29	Additional	An effluent spill occurred in Hout Bay Harbour, adjacent to the Lucky Star fishmeal factory. A complaint was received from the community via the Oceana Whistleblower line. An investigation undertaken by Oceana and the relevant authorities concluded that Oceana did not cause the spillage into the harbour. The authorities will attempt to find the root cause of the incident and possible failure of the harbour system in order to prevent any reoccurrence. All vessels and land-based facilities have oil spillage procedures.

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Overall				
	Total environmental protection expenditures and investments by type	EN30	Additional	Oceana is a member of the Responsible Fishing Alliance; we contribute R100 000 for membership. The Carbon Footprint Report, Appendix B, contains detail of all our environmental expenditures.
LABOUR PRACTICES AND DECENT WORK				
Disclosure on management approach				
	Disclosure on management approach – Employment – Labour/management relations – Occupational health and safety – Training and education – Diversity and equal opportunity – Equal remuneration for women and men	LA: DMA		Oceana Group aims to provide employees with opportunities to use their talents to achieve short-term and long-term goals, as well as to attract, retain and develop high-potential individuals. See Human Resources , pages 64-71 of the IR Oceana addresses each issue in detail in the relevant section of the Sustainability Report or IR.
Employment				
	Total workforce by employment type, employment contract, and region, broken down by gender	LA1	Core	See Number of Employees , page 26 and Workforce Occupational Levels , page 29
	Total number and rate of new employee hires and employee turnover by age group, gender, and region	LA2	Core	Labour turnover was 7,3%. See Human Resources , pages 64-65 of the IR. Currently Oceana does not report at lower levels of detail.
	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations	LA3	Additional	This information is available on request.
Labour/Management relations				
	Percentage of employees covered by collective bargaining agreements	LA4	Core	53% of the workforce is unionised. See Human Resources , page 71 of the IR
	Minimum notice period(s) regarding operational changes, including whether specified in collective agreements	LA5	Core	Oceana adheres to all labour legislation relevant to the countries in which it operates. See Driving Transformation and Localisation , page 68 of the IR
Occupational health and safety				
	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programmes	LA6	Additional	Health and safety committees are in place in line with the requirements of the Occupational Health and Safety Act. See Ensuring Occupational Health and Safety , page 70 of the IR
	Rates of injury, occupational diseases, lost days, absenteeism and total number of work-related fatalities, by region and by gender. Fatalities must be broken down by cause and explain measures to avoid future fatalities	LA7	Core	The Group Disabling Injury Frequency Rate (DIFR) was 0,5. See DIFR by Division . Absenteeism was 1,9%. See Absenteeism by Division , both on page 31
	Education, training, counselling, prevention, and risk-control programmes in place to assist workforce members, their families, or community members, regarding serious diseases	LA8	Core	The operational sites provide clinic facilities. There is also a voluntary testing and counselling process for HIV/AIDS for employees and their families. See Addressing HIV/AIDS and Promoting Wellness , page 33
	Health and safety topics covered in formal agreements with trade unions	LA9	Additional	Recognition agreements with unions in the Oceana Brands Limited (OB) and BCP divisions cover health and safety issues. See Ensuring Occupational Health and Safety , page 70 of the IR

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Training and education				
	Average hours of training per year per employee by gender and by category	LA10	Core	Not currently reported in hours. Oceana monitors the training spend in total, the number of employees attending learnerships, the percentage spend across all employees and black employees, and the expenditure on each type of training. See Total Spend of Training Across Race and Gender , page 28
	Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	LA11	Additional	Adult Education and Training, Leadership and Supervisory Training, Maritime, Health and Safety, Technical, Diversity/Equity training programmes are all in place. See Expenditure on Training , page 28
	Percentage of employees receiving regular performance and career development reviews, by gender	LA12	Additional	73% of non-bargaining unit employees completed a personal development plan. See Personal Development Plans, Workplace Skills and Training , page 30
Diversity and equal opportunity				
	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity	LA13	Core	See Group Equity Profile , page 29
	Ratio of basic salary of men to women by employee category, by significant locations of operation	LA14	Core	Not currently reported. We are signatories of the UN Global Compact, we respect equity and gender rights.
	Return to work and retention rates after parental leave, by gender	LA15 (New)	Core	All female employees are entitled to maternity leave. Male employees are entitled to three days of paternity leave. Two female employees who took maternity leave in the 2012/2013 reporting period did not return to work after taking leave. The rest were all still in employment at the time this report was compiled.
HUMAN RIGHTS				
Disclosure on management approach				
	Disclosure on management approach – Investment and procurement practices – Non-discrimination – Freedom of association and collective bargaining – Child labour – Prevention of forced and compulsory labour – Security practices – Assessment – Remediation	HR: DMA		Oceana adheres to all labour legislation relevant to the countries within which it operates. The group does not permit child labour or forced or compulsory labour. See Adhering to Employment Laws and Fostering Respect for Human Rights , page 28. A whistleblowers hotline is available for staff to air grievances. See Whistleblowers , page 96 of the IR

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Investment and procurement activities				
	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening	HR1	Core	When acquisitions are investigated due diligence is performed. Oceana introduced a Human Rights policy in 2012 which will be rolled out over the next two years. The supplier Code of Conduct will also be rolled out. See Oceana Business Code of Conduct , page 8
	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken	HR2	Core	The new Human Rights policy will be incorporated into the supply chain from 2014.
	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	HR3	Core	Currently not reported on. The new Human Rights policy will be rolled out to all staff during 2014 and 2015.
Non-discrimination				
	Total number of incidents of discrimination and actions taken	HR4	Core	Oceana experienced no grievance pertaining to Human Rights in the year under review. See Adhering to Employment Laws and Fostering Respect for Human Rights , page 28
Freedom of association and collective bargaining				
	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights	HR5	Core	No incidents reported during the year under review. Oceana has HR policies covering these issues, respects the Bill of Rights and is a UNGC signatory. We uphold the rights embedded in these provisions as well as the International Labour Organisation.
Child labour				
	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour	HR6	Core	No incidents of child labour in our own operations. Human Rights policy developed to ensure compliance by suppliers.
Forced and compulsory labour				
	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour	HR7	Core	Not material. Our operations do not pose such a risk.
Security practices				
	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations. Report countries of operation where armed security is used. Indicate type of security provider (in-house, public or private) and type of training provided (e.g. materials provision, workshops, courses)	HR8	Additional	In future, all companies contracted by Oceana will be trained in the Human Rights policy of the group. This will include companies we contact to carry out security services.

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Indigenous rights				
	Total number of incidents of violations involving rights of indigenous people and actions taken	HR9	Additional	No incidents reported during the year under review.
	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments	HR10 (New)	Core	Oceana conducted a Human Rights audit, including a focus on the compliance with legislation and internal policies and procedures. An action plan to correct the findings has been implemented. See Adhering to Employment Laws and Fostering Respect for Human Rights , page 28
	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms	HR11 (New)	Core	Oceana experienced no grievance pertaining to Human Rights in the year under review. See Adherence to Employment Laws and Fostering Respect for Human Rights , page 28
SOCIETY				
Disclosure on management approach				
	Disclosure on management approach – Local communities – Corruption – Public policy – Anti-competitive behaviour – Compliance	SO: DMA		Oceana engages in meaningful stakeholder engagement, especially with the west coast communities surrounding our operations. We identify new opportunities and implement social investment initiatives. Corruption and anti-competitive behaviour are both managed by our Code of Business Conduct and Ethics as well as our Anti-Corruption and Bribery policy.
Community				
	Percentage of operations with implemented local community engagement, impact assessments, and development programmes	S01	Core	See Stakeholder Engagement , pages 38-40
Corruption				
	Percentage and total number of business units analysed for risks related to corruption	S02	Core	The social, ethics and transformation committee considers corporate citizenship (including corruption). Each month the risk management process captures any instances of corruption. In addition, the Whistleblowers hotline is available for staff members to report corruption.
	Percentage of employees trained in organisation's anti-corruption policies and procedures	S03	Core	All new employees receive training on the Code of Business Conduct and Ethics. In 2013, we launched a customised training programme to reach 538 employees. See Adhering to Employment Laws and Fostering Respect for Human Rights , page 28
	Actions taken in response to incidents of corruption	S04	Core	Three employees were dismissed for instances involving corruption (theft), and one was dismissed for fraudulent conduct. See Adhering to Employment Laws and Fostering Respect for Human Rights , page 28
Public policy				
	Public policy positions and participation in public policy development and lobbying	S05	Core	The group's executive management, acting through industry bodies and independently, maintains a relationship with officials at different levels within the Department of Agriculture, Forestry and Fisheries (DAFF) and the Ministry of Fishing and Marine Resources (in Namibia). See Responding to Our Stakeholders , page 24 of the IR
	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country	S06	Additional	None were made during the year under review
Anti-competitive behaviour				
	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes	S07	Additional	See Compliance With Laws and Regulations , page 97 of the IR

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Compliance				
	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	S08	Core	Regulatory penalties and fines in the amount of R1 500 were paid in respect of late submission of documentation and late payment of amounts due. SAMSA imposed a fine on the skipper of the <i>Oceana Orion</i> , and certain of its crew, for failure to keep a proper watch and failure to avoid a collision. In all cases, management has taken appropriate action to prevent reoccurrence. See Compliance With Laws and Regulations , page 97 of the IR
	Operations with significant potential or actual negative impacts on local communities	S09 (New)	Core	Oceana maintains engagement with communities regarding employment creation opportunities and emissions from processing plants. See Responding to Our Stakeholders , page 25 of the IR
	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities	S010 (New)	Core	Lamberts Bay Foods was established following the collapse of the fishing industry in the town. An independent study found that approximately 2 250 jobs have been created on a national scale from this enterprise.
PRODUCT RESPONSIBILITY				
Disclosure on management approach				
	Disclosure on management approach: – Customer health and safety – Product and service labelling – Marketing communications – Customer privacy – Compliance	PR: DMA		Oceana recognises food safety as a business risk. Internal systems, third party audits, product recall processes and a proactive media engagement strategy are in place. See Food Safety page 17.
Customer health and safety				
	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures	PR1	Core	Food safety is a key focus across all Oceana divisions. Each has their own specific response. See Food Safety , pages 17-19
	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes	PR2	Additional	During the year we took the precautionary approach of removing one non-conforming product.
Product and service labelling				
	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements	PR3	Core	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.
	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes	PR4	Additional	None were reported during the year under review.
	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	PR5	Additional	A customer complaints line exists and results are discussed for the Lucky Star products.

GLOBAL REPORTING INITIATIVE (GRI) III CONTINUED

GRI SECTION	GRI INDICATOR	GRI NUMBER	CORE/ ADDITIONAL	RESPONSE/REFERENCE TO REPORT
Marketing communications				
	Programmes for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion and sponsorship	PR6	Core	The social, ethics and transformation committee is responsible for consumer relationships, including advertising, public relations and compliance with consumer protection laws. See The Committees Role and Responsibilities , page 106 of the IR
	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion and sponsorship by type of outcomes	PR7	Additional	None were reported during the year under review.
Customer privacy				
	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	PR8	Additional	None were reported during the year under review.
Compliance				
	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	PR9	Core	Regulatory penalties and fines in the amount of R1 500 were paid in respect of late submission of documentation and late payment of amounts due. SAMSA imposed a fine on the skipper of the <i>Oceana Orion</i> , and certain of its crew, for failure to keep a proper watch and failure to avoid a collision. In all cases management have taken appropriate action to prevent reoccurrence. See Compliance With Laws and Regulations , page 97 of the IR