



CORPORATE COMPLIANCE POLICY

**"If you think compliance is
expensive -try non-compliance"**

Siemens Senior Executive
(after the German-based multi-national
was fined the largest penalties [\$1.6bn]
ever for non-compliance)

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Definitions:

The following defined terms shall have the following meanings unless the context clearly indicates otherwise:

- "Oceana" - Oceana Group Limited;
- "Oceana Group" - Oceana and its subsidiary and associate companies and/or entities;
- "Board" - depending on the context, means the board of directors of Oceana or the board of directors of a particular Company within the Oceana Group, and "Boards" shall have a similar meaning;
- "Company" – Oceana and/or an individual Company within the Oceana Group, and "Companies" shall have a similar meaning;
- "Companies Act" – means the Companies Act 71 of 2008 or any amendments or Acts which replace or substitute the Companies Act;
- "Competition Act" – the (South African) Competition Act, No. 89 of 1998, as amended; and the (Namibian) Competition Act, No. 2 of 2003.
- "Consumer Protection Act" – the Consumer Protection Act, No. 68 of 2008, as amended;
- "the Corruption Act" – the Prevention and Combating of Corrupt Activities Act, No. 12 of 2004, as amended;
- "the National Credit Act" – the National Credit Act, No. 34 of 2005, as amended; and
- "Taxation Legislation" – the various tax legislation applicable at any point in time, including but not limited to the Income Tax Act, 58 of 1962, as amended and the Value-Added Tax Act, 89 of 1991, as amended.

Introduction:

Why be concerned about corporate compliance?

Oceana is esteemed as a company and as a group of companies with distinct strengths. While this reputation is the result of many years' work, the careless, improper actions of just one employee can damage the Oceana Group's image and reputation in an instant.

We must prevent this. To do so requires that all employees be guided in their activities by reasoned principles, particularly those set forth in this Corporate Compliance Policy. **Remember that the way each employee conducts the company's business can affect the Oceana Group's public image and reputation.**

Corporate compliance refers to the lawful, responsible and proper conduct of the Oceana Group's businesses. Each employee is obligated to obey all applicable laws and corporate guidelines in his or her work for the Oceana Group.

This Corporate Compliance Policy serves as the basis for this. It does not, however, cover all conceivable situations or describe all of the particular rules that must be followed. Furthermore, the law in some countries may prescribe stricter standards than those set forth here, in which case the stricter standards govern.

Unlawful and unethical behaviour can have far-reaching consequences for the Oceana Group, including:

- criminal penalties
- administrative fines
- civil damages
- seizure of profits
- exclusion from contracts
- termination of business relationships
- harm to our image and reputation
- negative perceptions by the investor community

Individual employees who breach the principles of this Corporate Compliance Policy also face serious consequences, such as fines or imprisonment, claims for damages, sanctions under labour law and possible termination of employment.

Employees who disobey the rules cannot claim to have been acting in the Oceana Group's interests, because any compliance violation ultimately harms the Company for which they work, as well as the Oceana Group. In view of the possible consequences, any advantage somebody purports to have gained in a specific situation can never, not even economically, be advantageous to the Oceana Group as a whole.

The Oceana Group desires to succeed in the competitive arena by being innovative, quality-driven, reliable and fair. If the only way to close a deal is by acting in a way that is illegal or

unethical, we will forego the deal. An employee who declines business in such circumstances will never be sanctioned as a result.

The Oceana Group is continuously in the public eye. By systematically implementing this Corporate Compliance Policy, we show the media, our investors, competitors, the authorities and our business partners that compliance is an integral part of our corporate culture.

For support, employees can turn to their managers or any of the Company's specialist departments, including the Group Compliance and Risk Manager, internal audit and the Oceana Group Company Secretary.

Employees should especially avail themselves of these resources when they are not clear about the applicable rules, or do not know how a specific situation should be handled, or when a high degree of risk is involved or the legal situation is unclear.

Oceana is an internationally active group of companies. Our employees, therefore, are exposed to a wide variety of norms and ethical principles, some of which are often unfamiliar to them. What at first sight appears to be a purely local matter may also be subject to the laws of a foreign jurisdiction.

This Corporate Compliance Policy is intended to provide employees with a point of reference in their daily work and thereby help them avoid violations. By definition, its focus is limited to areas of particular practical significance. However, it should also encourage employees to familiarise themselves with the rules that affect them and to seek counsel in case of doubt. Ignorance is no defence against the potential consequences of breaking the rules.

Our Principles of Business Conduct

1. We are committed to fair competition - no anti-competitive behaviour

The Oceana Group is a firm supporter of the free market economy. Competition law is the free market's most important tool for ensuring fair, unrestricted competition.

Violations of the competition laws of the individual countries and regions in which the Oceana Group does business can have dramatic consequences for the Oceana Group.

As mentioned in the introduction, we could face a variety of negative repercussions, including serious fines, lawsuits, exclusion from public contracts and harm to our reputation.

Employees who violate competition laws also face severe external repercussions, including possible imprisonment. Internally, the Oceana Group will not show any leniency towards employees who disregard competition laws. Even if a business matter runs into difficulties through no fault of the employee, resorting to unlawful agreements with competitors is not acceptable. Compliance is the only permissible course of action, even in a crisis.

The South African Competition Act applies to all economic activity within, or having an effect within, the Republic of South Africa. Non-compliance with the Competition Act, apart from having serious reputational and governance implications, can give rise to severe financial and criminal sanctions. It is therefore imperative from governance and risk management perspective that the Competition Act is complied with at all times.

Aside from the formal requirements of the Competition Act, with which all merger and/or acquisition activities that meet the prescribed thresholds should comply, the Competition Act specifically outlaws certain practices, namely restrictive horizontal practices, restrictive vertical practices, abuse of dominance and price discrimination by a dominant firm.

The Competition Act provides for administrative penalties, in terms of s59(1) for certain prohibited conduct of up to 10% of the annual turnover of a Company and its exports from the Republic during the Company's preceding financial year. Furthermore in terms of s74(1) if any person fails to comply with an interim or final order of the Competition Tribunal or Competition Appeal Court, the person can be imposed a fine of up to R500 000 or imprisonment of up to ten (10) years, or both. In addition, it is anticipated that amendments to the Competition Act will soon take effect, in terms of which the criminal prosecution of a director or a person having managerial authority within a Company will become possible under circumstances where the Company engaged in a prohibited practice and where such director or person participated in or knowingly acquiesced in the Company engaging in the said prohibited practice.

Having regard to the importance of fair competition, the Oceana Group has put a specific Competition Act Compliance programme in place. Such programme is to be completed by all applicable employees in conjunction with this Corporate Compliance Policy and is to be interpreted having regard to the broad principles and guidelines contained herein. The Board should regularly seek confirmation and assurance from management that the Competition Act is being complied with. Any non-compliance should be immediately reported to senior management (MD of the relevant Division, who in turn shall immediately report this to the Oceana CEO), the Group Strategic Services Director and to the Group Compliance and Risk Manager.

Adherence to the Competition Acts of both South Africa and Namibia is of critical importance. Each Company, its directors, officers and employees are therefore duty-bound to ensure that the conduct of the Company takes place within the ambit of the Competition Act and that the Competition Act is not transgressed under any circumstances. No breach of this duty will be tolerated and the strongest possible action will be instituted against employees where unlawful conduct is found to exist.

2. We are committed to integrity in business dealings - no bribery or corruption

The Oceana Group will not tolerate bribery or corruption.

Corruption is immoral and is contrary to fair competition and harms a company's economic standing and reputation. In addition, many countries including South Africa, treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country.

The Oceana Group rejects any form of bribery and corruption and will take the strongest possible action against employees when any conduct amounting to bribery and/or corruption is found to have occurred. In this regard the Oceana Group aligns itself fully with the fight against bribery and corruption, including but not limited to the Corruption Act, and any other similar legislation that deals with crimes involving dishonesty in any form.

The Oceana Group will not entertain any business dealings that involve breaking the law or

violating Company rules relating to the granting or acceptance of favours, mindful of the fact that some business may be lost as a result. No amount of potential additional revenue or earnings can justify illegal business practices. This applies without exception throughout the Oceana Group. No employee, regardless of the country in which he or she works, is entitled to violate the law or Company policy.

Any gift, even those given indirectly (for example to friends, relatives or associations), is considered an advantage. Examples include without limitation, cash, invitations to events, airline tickets, hotel stays, employment for friends or relatives, special personal favours and even the provision of expensive food and drink.

The granting or acceptance of gifts must take place in compliance with the law as well as Oceana's Code of Business Conduct and Ethics. If stricter rules and law exist, then the stricter standard must be observed. Oceana Group employees are not allowed, under any circumstances, to demand personal gifts.

Likewise, they may not offer or grant gifts of cash, or gifts equivalent to cash, to any public official. In dealings with business partners, employees must avoid granting or accepting any gifts in connection with the negotiation, award or performance of a contract, and any gift granted or accepted must be of a size deemed unobjectionable under the laws applicable to both the giver and the recipient. In case of doubt, please contact the Oceana Group Compliance and Risk Manager or the Group Company Secretary.

3. We are committed to the principle of sustainability - no inappropriate risks for human health and the environment

The Oceana Group is well aware of the goal to protect the environment and the health and safety of everyone who comes into contact with our products and business activities. This is extremely important to the way we conduct business.

The Oceana Group markets products to a diverse range of customers and countries. In keeping with this work, the Oceana Group acknowledges its duty to help meet the economic, ecological and social needs of present and future generations. In other words, we are committed to sustainable development.

3.1 Product stewardship

Ensuring the proper use of our products requires monitoring them over their entire product life cycles.

Addressing potential risks responsibly is particularly important. Once a potential risk related to the handling of one of our products is identified, the appropriate persons within the Company are to be notified immediately, even if the risk arises only in conjunction with a third party's product.

The purchaser of the product must be advised of risks associated with its use, and every product must to the extent that it is practical and applicable, bear the appropriate warning labels.

All laws and regulations must also be observed when handling hazardous materials. Prohibited materials may not be manufactured or brought onto Company premises.

3.2 Environmental protection

We believe in making an important contribution to sustainable development through the efficient use of resources. Reducing the consumption of energy and raw materials in production and

thereby limiting discharge requires exhausting all reasonable opportunities for process optimisation.

3.3 Plant safety

Factories and fishing vessels require careful planning and regular, systematic inspection and servicing in order to prevent malfunctions, accidents, spillages, and major hazards. Employees who work in our factories and vessels must be thoroughly trained, be given detailed working instructions and be properly supervised.

3.4 Occupational health and safety

Maintaining the health and wellbeing of our employees is in everyone's – the employees' and the Oceana Group's – best interests. Line management receives support in preventing accidents and illness from specialists in occupational medicine and safety who strive to maintain and improve safety and health.

Occupational health and safety regulations help to ensure this. Employees share in the responsibility for occupational safety in the workplace. Sometimes accidents occur because we become less careful. Extreme care must be exercised when dealing with potential sources of danger.

Every employee is called upon to strictly and constantly observe all safety rules in his or her respective workplace: for his or her personal benefit, and for the benefit of colleagues and the Oceana Group as a whole. When an incident occurs, the responsible managers and safety representatives must immediately notify those divisions of the Company responsible for health, safety and environmental protection.

4. We are committed to safeguarding equal opportunity in securities trading - no illegal insider trading

Every Oceana Group employee is required by law to maintain secrecy with respect to any inside, non-public, price sensitive information about the Oceana Group that could affect the Oceana Group's share price.

Using such inside information for personal gain or the gain of others is prohibited. Common examples of inside information include without limitation, knowledge about the intended disposal of parts of the Oceana Group, the acquisition of outside companies, the formation of joint ventures, new findings regarding key products, or specific information about business developments which have not yet been made public. Insider trading laws prohibit dealing in securities on the basis of non-public, price sensitive information or the sharing of such information with third parties. In other words, insiders may not divulge non-public price sensitive information to third parties, whether inside or outside of the Oceana Group, except on a strict need-to-know basis and with reasonable measures in place to ensure that the information remains confidential and cannot be misappropriated by third parties.

Employees are referred to Oceana's Code of Business Conduct and Ethics which provides guidance regarding insider trading and dealing in Oceana securities. If any doubt exists in this regard, employees should first consult with the Oceana Group Company Secretary.

5. We are committed to proper record-keeping and transparent financial reporting - no deception

We are committed to keeping accurate and reliable financial records necessary to meet the company's legal and financial obligations and to manage its affairs.

The books and records of the company must reflect all business transactions in an accurate and timely manner. Undisclosed or unrecorded revenues, expenses, assets or liabilities are not permissible and management must ensure that proper disclosure takes place. Employees responsible for accounting and record keeping functions are expected to be diligent in ensuring that proper records are maintained.

Every employee tasked with presenting information that is relevant to the Oceana Group's financial reporting and destined for public disclosure is responsible for ensuring that this information is complete and accurate.

Employees must promptly notify their managers or the relevant financial director if ever they have reason to doubt whether material business transactions have been correctly presented in the financial reporting. Oceana provides its shareholders, financial analysts, the investor community, media outlets and the general public with regular, timely reports on the Oceana Group's financial situation and material changes in its business so as to maintain the greatest possible degree of transparency.

Oceana's reporting follows the requirements specified in the Companies Act, the JSE Listings Requirements and International Financial Reporting Standards, informing shareholders twice per annum about the Oceana Group's financial position, results of operations and cash flows. The annual financial statements are published and circulated within 90 days of the end of the financial year. The Oceana Group also makes use of the Internet as a medium to provide interested parties with the latest corporate information.

The Oceana website includes a financial calendar with important publication and event dates, including dates for the integrated report, interim report and the annual general meeting. In the interests of fair disclosure, Oceana treats all of its shareholders and investor audiences the same when it comes to the provision of information and must comply with the Listings Requirements as regards disclosure of material price-sensitive information.

6. We are committed to fair and respectful working conditions - no discrimination

No person is to be unfairly treated, disadvantaged, favoured, harassed or ostracised because of race or ethnicity, colour, nationality, religion, ideology, gender, age, physical characteristics, appearance or sexual orientation.

Everyone has the right to be protected against discrimination and harassment of any kind whether within the Oceana Group or in contacts with outside parties.

The Oceana Group expects its employees to be objective, fair and respectful in their dealings with colleagues and third parties, including customers, suppliers and officials. By doing so, they also make an active contribution towards protecting Oceana's good name and reputation. The

responsibility for maintaining these standards of conduct rests with each and every employee, not just with managers. A violation of these standards will not be tolerated. Any conflicts should be referred to the employee's manager, the human resources department or the relevant legal department, which, if necessary, will take the required action to appropriately address any wrongdoing and to prevent a repeat violation.

7. We are committed to protecting the fruits of our own endeavours and respecting the legally recognised rights of others - no infringement of our own or other's intellectual property rights

They are extremely important to the Oceana Group's future, as are our trademarks and brands, the value of which may in some cases be substantial and the result of decades of effort and marketing expenditure.

We must therefore take utmost care to ensure that our rights in the intellectual property we create enjoy full legal protection. No employee may create or dispose of Oceana Group intellectual property (for example: patents, marks, particularly trademarks, utility models and designs, or copyright) or execute an agreement or otherwise exercise discretionary authority over such property without the express written consent of the Oceana Group Company Secretary and the Group Commercial / legal department.

Care should be taken to avoid any unintentional transfer of intellectual property through the negligent handling of company information in public, such as working with laptop computers in full view of others or making casual comments in public or in presentations. Business data must be protected against unauthorised access by third parties. No employee may make copies of business papers or data files other than for work-related purposes. Employees must respect the valid, legally recognised intellectual property rights of third parties and may not use them without permission. Trade secrets and new knowledge should not be passed on to third parties, much less made public, without the proper legal protection.

8. We are committed to keeping corporate and personal interests separate - no conflicts of interest

All employees must separate their own personal interests from those of the Oceana Group.

During working hours, in particular, employees have a primary duty to promote the Oceana Group's corporate interests. Conflicts of interest – or even the mere appearance of such conflicts – must be avoided. A list of typical areas of conflict is provided below. Where a conflict appears likely, employees should seek assistance from their manager.

- Personal interests: A person's own individual interests or relationships must not influence business decisions of the Oceana Group.
- Business relationships with third parties: Business relationships with third parties must be formed on the basis of objective criteria (for example, price, quality, reliability, technological standard, product suitability, existence of a long-standing and trouble-free business relationship). The execution of a contract or continuation or termination of a business relationship with a third party must not be influenced by personal relationships,

personal interests or tangible or intangible personal advantages. The supply of products or provision of services to the Oceana Group by companies that are controlled by Oceana Group employees or their close relatives must be subject to close scrutiny.

- Contracting of suppliers or other business partners of the Oceana Group for personal purposes: If an employee wishes to place a personal supply or other business contract with a person or entity that also has a pre-existing business relationship with the Oceana Group and that employee is in a position to directly or indirectly influence the Oceana Group's business relationship with the supplier or business partner in question, the employee must notify his or her manager in advance and receive the manager's written permission before placing the contract.
- Using the services of the Oceana Group employees for personal purposes: Managers may not abuse their authority by availing themselves of the services of Oceana Group employees for personal purposes.
- Use of Oceana Group property (for example, equipment, goods, vehicles, office supplies, documents, files, data storage media): Employees may not use items belonging to the Oceana Group for their own personal purposes or remove such items from the Company premises without their manager's express consent. Likewise, no data, programs or Company papers may be copied or removed from the Company's premises without prior approval.
- Use of the internet and e-mail system: The Oceana Group provides Internet access and electronic communications for business purposes. The occasional only marginal use of the business Internet connection for private purposes during individual lunch or tea breaks is permitted. This permission may be revoked at any time. Private Internet use must be strictly limited in duration and must not interfere with an employee's duties. Private use of the Internet is subject to the provisions of the Oceana Group Computer, Internet and e-mail Usage Policy. The e-mail system provided by the Oceana Group is predominantly for business purposes and this should be respected by employees.
- Outside employment: Any employee intending to accept employment with an outside company – even on a freelance basis – or to set up his or her own business must inform his or her manager and receive their prior consent thereto in writing. This applies particularly to positions with companies that already do business or compete with the Oceana Group or might reasonably do so.
- Personal involvement in political parties or other social or political institutions: The Oceana Group welcomes its employees' voluntary involvement in such organisations as long as it does not interfere with the performance of their duties for the Oceana Group and provided such employees do not publically associate their political preference with the Oceana Group. Employees are referred to Oceana's Code of Business Conduct and Ethics dealing with political party contributions.
- Public expression of personal opinions by employees: When expressing their personal opinions in public, employees must not give the impression that these opinions represent the views of the Oceana Group.

9. We are committed to co-operating with the authorities - no misinformation

The Oceana Group endeavours to be co-operative in its dealings with all authorities and government agencies while at the same time defending its own interests and rights.

All employees responsible for collecting company information and communicating it to the Stock Exchange News Service, to other regulatory authorities or for other public announcements should communicate such information completely, openly, correctly, timeously and understandably. The Group Communications Manager and the Group Strategic Services Director and the Group Compliance and Risk Manager must be notified immediately when employees are contacted by any authority, such as the police or public prosecutor's office, whose job it is to investigate possible legal violations or prosecute violators. In particular, information or documents should be provided only after consulting and with the assistance of the Group Communications Manager and the Group Commercial / legal department.

10. We are committed to complying with laws, regulations, rules and standards - no breach of laws

Compliance with applicable laws, regulations, rules and standards is critical from a risk management and governance perspective.

There exists a plethora of laws, regulations and rules applicable to Companies and the businesses conducted by them. In addition, there may be industry standards and rules which specific Companies may decide to apply on a voluntary (non-binding) basis.

Compliance with applicable laws, regulations, rules and standards is critical from a risk management and governance perspective. Failure to comply therewith creates potentially material risks, for example the financial penalties applicable for non-compliance with the Companies Act, the Competition Act, the Consumer Protection Act, the Marine Living Resources Act, environmental legislation, health and safety legislation, the National Credit Act and Taxation Legislation. In addition, non-compliance indicates poor governance and has reputational implications.

The Board should at all times be aware of the laws, regulations, rules and standards that specifically apply to the Company and its businesses and should be aware of any changes that may take place therein. In addition, the Board should ensure that the Company complies with laws, regulations, rules and standards by implementing an effective compliance framework and processes. The Oceana Group Compliance and Risk Manager and the Oceana Group Company Secretary have an important role to play in this regard. Various policies exist within the Oceana Group requiring compliance with the applicable legislation. The various company secretarial, financial, internal audit, legal and tax functions assist Companies in ensuring that legislation is complied with at all times through a process of self-education, as well as educating other members of management and staff regarding legislative requirements, and through internal checks and audits.

In addition, compliance reports are issued on a regular and on-going basis to the Boards of the various companies within the Oceana Group and the various Board committees.

How does this policy affect each individual's daily work routine?

All employees must adhere to this Corporate Compliance Policy. It is intended to protect both the Oceana Group and its employees. This policy defines the framework within which the Oceana Group's employees can act with confidence and directly benefits them by, among other things, safeguarding the employees from discrimination and establishing rules for occupational safety. Its observance therefore is in the best interest of employees both as individuals and as important contributors to the Oceana Group's success as a whole – success from which employees benefit.

Oceana's approach towards this policy is to provide a framework of broad principles and guidelines rather than a set of hard and fast rules. Oceana believes that it is not possible to provide a set of rules that will cover every possible scenario and it therefore accepts that it is preferable to rather provide principles and guidelines against which conduct can be tested. This also provides flexibility for adaptation and adjustment as and when circumstances and practices change from time to time. This policy should therefore be interpreted and understood as a set of principles and guidelines against which conduct is to be measured.

Oceana has various policies which deal with several aspects of corporate, business and employee behaviour and these policies are applicable to all Companies, businesses and employees within the Oceana Group.

As such, this policy does not replace any existing policies but is rather to be treated as a high level policy dealing with responsible corporate behaviour as it provides the background and framework against which all conduct in the Oceana Group and all existing policies should be measured and interpreted.

Every employee is called upon to review his/her own behaviour in light of the standards set forth in this Corporate Compliance Policy and to ensure that these standards are observed. Employees should bear in mind that there are specific laws and specific internal policies that address in greater detail the topics discussed here. Employees are required to familiarise themselves with the applicable laws and these internal policies governing their areas of responsibility and to follow these laws, rules and guidelines in their daily work. Any ambiguities should be clarified. The Oceana Group provides its employees with access to all the necessary information resources and counsel to prevent infringements of the law or company regulations.

The provisions of this Corporate Compliance Policy, read in conjunction with the other Oceana Group policies, take precedence over any conflicting instructions given by any manager. In addition to support from managers, there are information resources (such as the Oceana Policies) accessible via SharePoint, and advice is available from the specialist departments such as the Group Compliance and Risk Manager, Group Strategic Services and the Group Company Secretary.

Every manager must organise his or her area of responsibility so as to ensure adherence to this Corporate Compliance Policy and applicable law. In particular, managers must communicate the rules applicable in their areas of responsibility, monitor adherence to them and enforce them. Problems must be actively addressed and resolved. Each manager is expected to set an example for his or her area of responsibility by acting with integrity and thereby ensure that compliance is internalised as a fundamental part of our corporate culture.

All employees are required to immediately report any breaches of the Corporate Compliance Policy.

Breaches of this Corporate Compliance Policy should be reported to the Group Compliance and Risk Manager, Divisional Managing Directors or the Oceana Group Company Secretary immediately.

Employees may also avail themselves of the Whistle Blowers anonymous hotline: 0800 00 66 60 (South Africa); 0800 0006 66 (Namibia) or e-mail Information@whistleblowing.co.za

When employees suspect bribery, corruption or the intentional mishandling of Company property or finances, for example embezzlement, fraud, breach of trust or the offering or acceptance of bribes, they should report the matter to the Whistle Blowers anonymous hotline without delay.

Promptly reporting this kind of information is likely to save the Oceana Group from suffering additional, more serious harm or at least mitigate the damage. For this reason employees should direct this kind of information to the individuals and departments mentioned above, because they are most capable of taking the necessary legal steps. No employee will be discriminated against because he or she, acting in good faith, reports a possible breach of compliance.

When the reporting employee is himself/herself involved in a breach of this Corporate Compliance Policy, the Oceana Group, in determining any action to be taken against that employee, will consider whether or not the report and any timely assistance given in investigating the possible breach helped avert further damage to the Oceana Group. The viability and effectiveness of this Corporate Compliance Policy will be regularly reviewed. Constant monitoring along with frequent evaluation and reporting are designed to ensure its continual improvement.

The Board, and insofar as applicable the Audit Committee, Risk Management Committees, and the Social, Ethics and Transformation Committee, established by the Board, must regularly, at least once per annum, as a formal agenda item discuss and review this policy and the compliance therewith. In this regard formal reports should be submitted by such departments and/or individuals responsible for implementation of this policy. The Board may task such person or persons, who need not necessarily be Board members, to take responsibility for the implementation of, compliance with and reporting on this policy. The Oceana Board is required to review and if necessary to amend this policy on an ongoing basis in reaction to or in anticipation of changed requirements or circumstances.

This Corporate Compliance Policy applies to all directors and employees of the Oceana Group internationally.

FRANCOIS KUTTEL

DATE: 11 November 2015

Chief Executive Officer

Lists of statutes applicable to Oceana Group Limited – RSA

General Statutes

1. Advertising Standards Authority Code
2. Anti-corruption Act 2003
3. Atmospheric Pollution Prevention Act, 45 of 1965
4. Basic Conditions of Employment Act no 75 of 1997
5. Broad Based Black Economic Empowerment Act 53 of 2003
6. Broad Based Black Economic Empowerment Amendment Act 46 of 2013
7. Cleaning Chemicals for Food Industry SANS 1828 and 1853; 2005
8. Companies Act No 71 of 2008
9. Section 43 of 2011 Regulations to Companies Act 2008,
10. Compensation for Occupational injuries and Diseases Act 130 of 1993
11. Competition Act No 89 of 1998
12. Competition Amendment Act No 1 of 2009
13. Constitution of South Africa, 1996
14. Consumer Protection Act No 68 of 2008
15. Copyright Act No 89 of 1987
16. Currency and Exchanges Act No 9 of 1933
17. Electronic Communications and Transactions Act 25 of 2002
18. Employment Equity Act No 55 Of 1998
19. Exchange Control Regulations 1961
20. Farm Feeds Act 35 of 1947
21. Financial Intelligence Centre Act 2001
22. Foodstuffs Cosmetics and Disinfectants Act 54 of 1972
23. Hazardous Substances Act 15 of 1973
24. Health Act 63 of 1977
25. Hygiene requirements for food premises R918 of 30 July 1999
26. Income Tax Act No 58 of 1962
27. Insider Trading Act No 135 of 1998
28. JSE Listing Requirements
29. King III
30. Labour Relations Act No 66 of 1995
31. Labour Amendment Act, 2012
32. Merchandise Marks Act 17 of 1941
33. National Building Regs SASS 0440/1990
34. National Credit Act 2005
35. National Environmental Management Air quality Act 39 of 2004
36. National Environmental Management No 107 of 19
37. National Environmental Management Protected Areas Act 57 of 2003
38. National Environmental Management: Integrated Coastal Management Act 24 of 2008
39. National Regulator for Compulsory Specifications Act No 5 of 2008
40. National Road Traffic Act 93 of 1996
41. National Water Act 36 of 1998
42. Occupational Health and Safety Act No 85 of 1993
43. OECD Convention recommendations on anti-corruption
44. Offensive Trade Regulations Notice 1606 of 1934
45. Patents Act 57 of 1978
46. Pension Fund Act No 24 of 1956
47. Perishable Products Export Control Act of 1983
48. Prevention and Combating of Corruption Act 12 of 2002
49. Prevention of Organised Crime Act, 2004
50. Promotion of Access to Information Act
51. Protection of Business Act 99 of 1978
52. Protection of Access to Information Act 4 of 2013
53. Public Holiday Act
54. SARB regulations
55. Skills Development Act No 97 of 1998
56. Skills Development Levies Act 9 of 1999
57. Trade Marks Act No 194 of 1993
58. Trade Metrology Act 77 of 1973
59. Unemployment Insurance Act No 30 of 1966
- 60.
61. Unemployment Insurance Contribution Act No 4 of 2002
62. US Foreign Corrupt Practices Act of 1977
63. Value Added Tax Act No 89 of 1991

Maritime/Fishing Statutes

1. Admiralty Jurisdiction Regulation Act, 105 of 1983
2. Carriage of Goods by Sea Act, 1 of 1986
3. Customs and Excise Act, 91 of 1964
4. Dumping at Sea Control Act, 73 of 1980
5. Electronic Communications Act, 36 of 2005
6. Legal Succession to South African Transport Services Act, 9 of 1989
7. Marine Living Resources Act, 18 Of 1998
8. Marine Pollution (Control & Civil Liability) Act, 6 of 1981
9. Marine Pollution (intervention) Act, 64 of 1987
10. Marine Pollution (Prevention of Pollution from Ships) Act 2 of 1986
11. Marine Traffic Act, 2 of 1981
12. Maritime Zones Act, 15 of 1994
13. Merchant Shipping Act, 57 of 1951
14. National Ports Act, 12 of 2005
15. Sea Birds and Seals Protection Act, 46 of 1973
16. Sea Fishery Act, 12 of 1988
17. Sea Transport Documents Act, 65 of 2000
18. Ship Registration Act, 58 of 1998
19. South African Maritime Safety Authority Act, 5 of 1998
20. Wreck and Salvage Act 94 of 1996

General Statutes

Maritime/Fishing/Environmental Statutes

Corporate

Companies Act,

Competition

2 Competition Act, 2003

Crime, Corruption and Money Laundering

3 Anti-Corruption Act, 2003

4 Prevention of Organised Crime Act, 2004

5 Financial Intelligence Act, 2007

Currency and Exchanges

6 Currency and Exchanges Act, 1933

7 Exchange Control Regulations, 1961

Communications

8. Communications Act, 2009

Employment or Employment Related

9 Affirmative Action (Employment) Act, 1996

10 Labour Act, 2007

11 Labour Amendment Act, 2012

12 Regulations relating to the Health and Safety of Employees at Work

13 Employees Compensation Act, 1941

14 Merchant Shipping Act, 1951 (also regulates some employment

15 Immigration Control Act, 1993

16 Social Security Act, 1994

17 Pension Funds Act, 1956

Health

18 Public Health Act, 1919 (the sections remaining)

19 International health Regulations Act, 1974

20 Foodstuffs, Cosmetics and Disinfectants Ordinance, 1979

Intellectual Property Laws

21 Copyright Act, 1994

22 Patents, Designs, Trade Marks and Copyright Act, 1916

23 Merchandise Marks Act, 1941

24 Trade Marks Act, 1973

Revenue

25 Income Tax Act, 1961

26 Value Added Tax Act, 2000

27 Customs and Excise Act,

1998 **Trade**

28 Standards Act, 1962

29 Trade Metrology Act, 1973

30 Standards Act, 2005

31 Import and Export Control Act,

1994 **General**

32 Constitution

33 Public Holidays Act, 1991

34 Road Traffic and Transport Act, 1999

35 Water Act, 1956

Bills and Expected Future Laws

36 Water Resources Management Act, 2004

37 Namibia Maritime Authority Bill, 2010

Fishing and

Maritime Admiralty

2 Admiralty Court Rules

3 Merchant Shipping Act, 1951

4 Marine Resources Act 2000

5 Marine Traffic Act, 1981

6 Merchant Shipping Amendment Act 1991

7 Territorial Sea and Exclusive Economic Zone of Namibia Act, 1990

8 Wreck and Salvage Act, 2004

9 Namibian Ports Authority Act, 1994

Environment (Including Maritime Environmental or Conservation

10 Hazardous Substances Ordinance, 1974

11 Atmospheric Pollution Prevention Ordinance, 1976

12 Dumping at Sea Control Act, 1980

13 Prevention and Combating of Pollution of the Sea by Oil Act, 1961

14 Regulations under the Marine Pollution (Prevention of Pollution from Ships)

(not clear whether this law applies to Namibia, but Regulations were

15 Environmental Management Act, 2007