

UNITED NATIONS GLOBAL COMPACT

COMMUNICATION ON PROGRESS

17 December 2015

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.



1 Introduction

Commercial fishing is pivotal to Africa's development. Marine resources are an acknowledged renewable and accessible source of protein. It is also widely acknowledged the fish protein is an affordable source of protein. The fishing value chains offer opportunities for inclusive growth and employment at variable skill levels, in towns and cities as well as isolated coastal villages on the African continent.

We believe large companies afforded the right to fish should reflect their ability to turn these rights into broad-based social and economic value – safely, inclusively and sustainably.

Over 97 years, Oceana has developed a deep respect for the relationship between fishing rights and sustainable value. It informs every aspect of our business: how we fish; who benefits; the efficiency with which we fish, the sustainability of the fishing practises and the value creation model it is committed to. Together these elements represent the cornerstones of Oceana's sustainability strategy: our ability to optimise the delivery of societal value and economic throughout the business.

In addition, our human rights policy is aimed at promoting equality of opportunity and combating discrimination. Our human rights policy applied across all our operations in South Africa, Namibia, Angola and the United States.

Oceana Group Limited (Oceana) supports internationally recognised and best practice human rights interventions and policies. We make a concerted effort to avoid any involvement, either directly or indirectly, in the abuse of human rights and actively engage in sustainable practices for the advancement of our stakeholders. 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.

We have prepared this Communication on Progress (COP), to reflect the initiatives undertaken in the 2015 communication period as well as some details those initiatives earmarked for actioning in the 2016 reporting period.

2 Human Rights

2.1 Applicable Global Compact Principles:

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

Relevant GRI Indicators:

- Management Approach is described in the GRI Table
- GRI G4

2.2 Results of the self-assessment exercise

2.2.1 Assessment Methodology

During 2014 we received human rights compliance assessment training, which was facilitated by the Danish Institute for Human Rights. This formed the basis of an internal assessment based on the Human Rights Compliance Assessment (HRCA), developed by the Human Rights and Business Project at the Danish Institute for Human Rights.

The HRCA tool constitutes a database of over 350 questions and 1 000 corresponding human rights indicators, developed from the Universal Declaration of Human Rights, the 1966 Dual Covenants and over 80 other major human rights treaties and conventions. We used the HRCA Quick Check edition, which is an interactive computer programme, which allows Oceana to select and modify the information in the database to suit the types of business it is party to and area of operations. The standards and indicators are updated on an annual basis, based on feedback from both company users and human rights groups, to ensure that the tool addresses the real life problems faced by companies and to reflect changes and developments in international human rights law. The HRCA Quick Check comprises approximately 10% of all the questions contained in the entire HRCA database and relates to some of the most essential human rights issues a company is required to consider in relation to its activities.

Subsequent to the 2014 assessment, Oceana prepared and implemented an action plan to address non-conformances and areas of improvement. The 2015 COP therefore reflects the progress made on the action plan identified in 2014. The initial assessment was applicable to all our operations in South Africa and Namibia. A follow-up assessment to be undertaken in 2016, will take into account our new operations in Angola and the United States.

Human Rights Compliance Rate as at November 2015

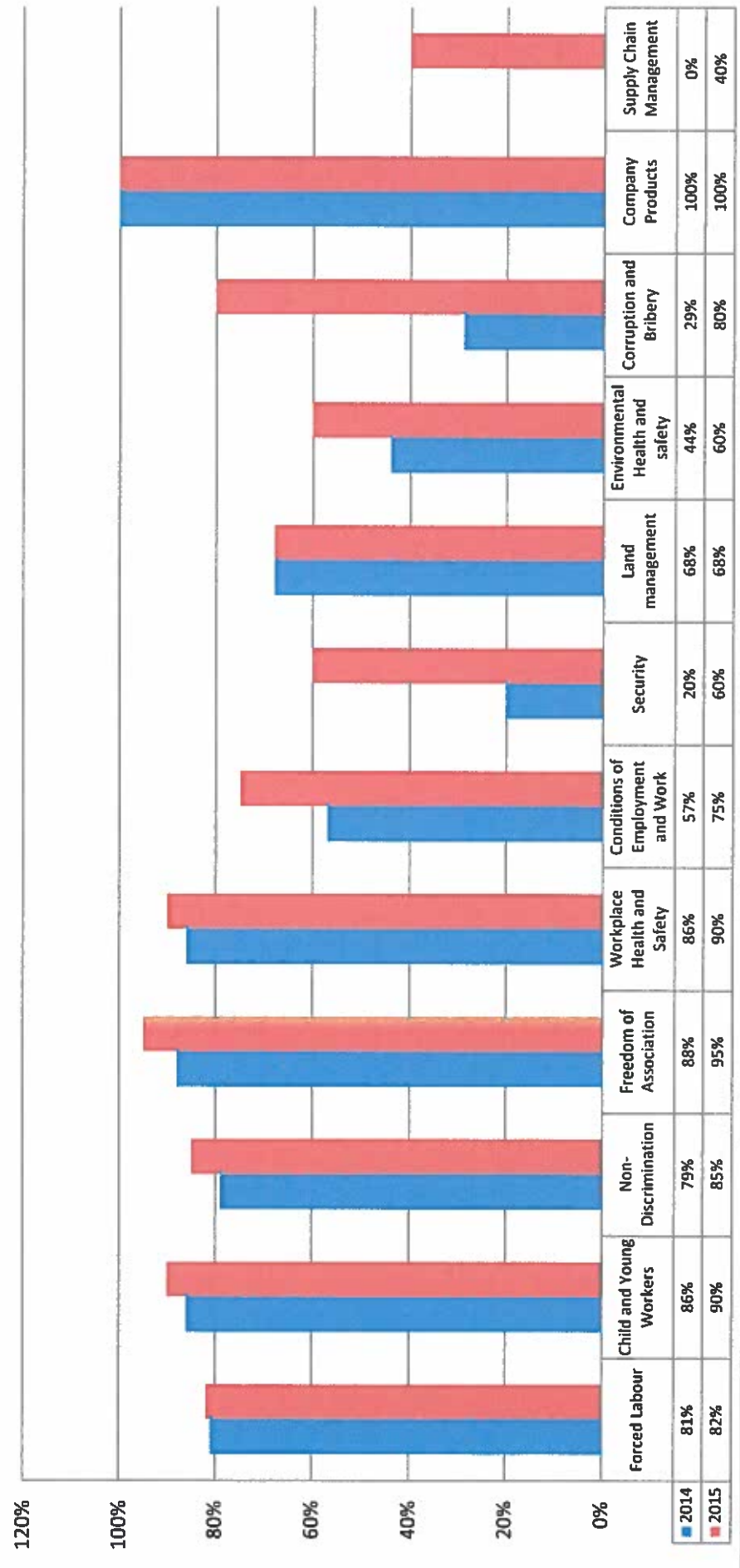


Figure 1 2015 Human Rights Compliance Assessment

2.2.2 Measurement of Outcomes

Oceana has an organizational culture which supports local and internationally recognized 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. More specifically, within the South African context, we comply with all the legislation in place and specifically the South African Bill of Rights.

Our human rights policy is aimed at promoting equality of opportunity and combating discrimination. It is being applied across all our operations in South Africa and Namibia. Our human rights policy is enforced by our participation in and as a signatory to the United Nations Global Compact (UNGC). The UNGC identifies universal human rights best practice associated with labour, health and safety, procurement environment, land management, security and anti-corruption and requires that we annually report on our progress made in meeting the ten principles associated with the afore-mentioned focus areas.

In 2015 we reassessed our human rights compliance in terms of the requirements of the HRCA. When compared to our 2014 assessment, we've improved our compliance level across the span of the ten principle areas with significant strides made in the Environmental and Health, Corruption and Bribery and Supply Chain Management focus areas.

More specifically we have, appointed a dedicated Procurement Manager, who will be responsible for implementing a process to standardise the supplier selection process and incorporating the evaluation of health and safety, child labour and environmental aspects with suppliers who are considered high risk.

The group health and safety policy articulates our commitment to managing and maintaining health and safety in the workplace at the highest standards. These policies are communicated to all land-based and vessel employees. In order to ensure implementation and compliance with our health and safety procedures and policies, external audits of compliance are undertaken annually and are regularly reported to senior and executive management within the organisation for further attention and compliance monitoring in accordance with set schedules. Please refer to Table 1 for the results of the results of the latest external risk audits.

**OCEANA GROUP LIMITED F2014-2015
DIVISIONAL AVERAGE RISK AUDIT RESULTS**

Oceana Group	RISK CONTROL		FIRE DEFENCE		SECURITY		EMERGENCY PLANNING		HEALTH & SAFETY		MOTOR		AVERAGE RATING		DIFR INDICATOR	
	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR
DIVISION																
Lucky Star	100	100	98	95	100	96	100	99	99	98	100	99	99	97	99	100
Etosha Fishing Corp	100	95	95	93	100	100	100	100	95	91	99	99	97	94	96	93
Lobster, Squid & Fries	100	100	99	96	99	99	100	99	96	97	100	99	98	97	95	98
CCS Logistics	100	100	96	97	100	100	100	100	98	97	99	100	98	98	97	99
Oceana House	100	87	98	95	100	100	85	78	100	96	100	100	98	94	100	100
AVERAGE	100	99	97	96	99	99	99	98	98	97	99	100	98	97	97	99

Table 1: Group Risk Assessment Results

Risk assessments are regularly undertaken in a number of areas, including ventilation, illumination, noise, hazardous chemicals, and refrigeration. Recommendations from the assessments are implemented to promote a safe working environment.

Various actions have been completed to ensure that our employment practices are aligned to our human rights principles, such as-

- Our leadership essentials programme for line managers includes a focus on minimising discrimination in our recruitment practices. This ensures that managers are trained to understand the company's anti-discrimination policies.
- Line Managers are trained on their responsibilities in terms of employment practices. Performance management was a key focus area in 2015 where over 90% of our senior and middle managers undertook performance management training. We continue to train our junior and first line supervisory manager as well as general staff on the company's performance management policy and procedures.
- A head of procurement has been appointed to manage the implementation of human rights policy in the supply chain, amongst other responsibilities.
- The Oceana Human Rights Policy has been published on the company's intranet and has been distributed to all operational sites.
- Those elements of the Human Rights Policy that pertain to employment practices are discussed at our staff forums where the employer engages with staff and the union representatives.

We are committed to continually improving our compliance with international best practice and to that end are implementing a of continuous improvement plan. From a legislative perspective, we are compliant with all applicable legislation in the countries in which we operate.

2.2.3 Continual Improvement Commitment

The results of the human rights compliance assessment was presented to the Board of Directors' sub-committee, the Social, Ethics and Transformation Committee (SETCOM) of the company's board. SETCOM oversees activities within the company that relate to social and economic development, good corporate citizenship, the environment, health and safety, labour and employment within the company. In addition, SETCOM is tasked with monitoring the company's compliance with national legislative labour and human right legislation as well as promoting human rights within the company. During the SETCOM meeting held on the 6th November 2015, the following actions were proposed in order to enhance and promote our continual improvement within the labour and human rights sphere:

- Benchmarking our performance with corporations that are seen to be leaders within the human rights field;

- Attending on more effective shop floor engagement solutions with the emphasis on eliciting employee perceptions on human rights practices and will include conducting an employee culture survey; and
- Human rights training will be arranged for key internal staff and a social audit undertaken at a pilot site to improve on our human rights training requirements.

2.3 Occupational Health and Safety

2.3.1 Measurement of Outcomes

The occupational health and safety function within the Group is managed as part of the human resource and risk portfolios. In addition, the managing directors of the operating divisions are responsible for ensuring full compliance with relevant occupational health and safety legislation and that the required structures are in place.

There is inherent safety risks associated with activities on board fishing vessels and in land and sea based processing factories. Health and safety accordingly features as one of our top ten material risk factors. Divisional managing directors are responsible for ensuring full compliance with relevant occupational health and safety legislation. Health and safety committees have been established at all work places in line with the requirements of the Occupational Health and Safety Act. To mitigate the risk of injury we emphasise preventative controls (including providing appropriate equipment) and operating processes. We conduct external and internal audits at sites and vessels, as well as effective safety monitoring, training and enforcement programmes. Our audit results are reported in Table 1.

The group's disabling injury frequency rate (DIFR) for 2015 was 0.7 (2014: 0.5), against a guideline metric of 2. Our annual health and safety audit scores averaged 97% (2014: 98%) indicating that our risk control, fire defence, security, emergency planning and health and safety practices are well managed. We have engaged the services of Marsh Compensation Technologies (associated with Marsh being our risk assurance service provider) to address claim submissions, recoveries and for liaison with the Compensation Commissioner.

Our consumers rely on us to safeguard the integrity, quality and wholesomeness of the products we manufacture and sell. We strive to fulfill our customers' quality expectations, by providing products that are safe and produced to the highest quality.

Our food safety system, which extends along the full supply chain (from "harvest to fork"), is founded on internationally recognised technical regulations and standards aimed at protecting and improving public health. We meet the requirements of the compulsory specifications administered in South Africa, as well as standards and principles of Codex Alimentarius and ISO. We use the World Organisation for Animal Health principles as the basis for animal health systems. This approach is designed to address allergens and biological, chemical and physical hazards that can occur if not controlled. We conduct

regular audits, inspections, surveillance and examinations of product designs, products, services, processes and processing plants to determine their conformity with specific or general health and safety committee regulations.

2.3.1.1 Health and safety policy and statement

The group health and safety policy articulates our commitment to managing health and safety in the workplace to the highest standards. It is communicated to all land-based and vessel based employees. Recognition agreements with the unions in the Lucky Star and BCP divisions also cover health and safety issues.

We offer our employees onsite occupational health practitioners and medical insurance, as well as an employee assistance programme. Employees have responded positively to on-site counselling, which covers a variety of issues including legal, financial and general counselling. This project began as a pilot project at a number of sites to ensure that we provide an appropriate and adequate employee assistance programme and has now been extended to the entire group. Rollouts are now taking place in each of our divisions.

The expenditure on health and safety training for 2015 is summarized in the table below:

	Male				Female				Total
Health and Safety training	R 262 059	R 409 620	R 100 418	R 110 645	R 31 969	R 25 002	R 3 445	R 4 566	R 947 724

2.3.2 Continual Improvement Commitment

We have completed a number of the occupational health and safety action items identified in 2014. This achievement is reflected in the compliance score achieved. However in order to foster the system of continual improvement, the following further measures will be implemented:

- To deliver high levels of performance in a challenging context, we will continue to focus on talent attraction, retention and development.
- To include generic compliance targets in applicable management contracts.
- To maximise efficiencies, we will continue to refine our organisational design and HR practices in the human resources function and the rest of the business.
- To ensure high levels of employee engagement, we will continue to invest in maintaining an enabling culture that has clarity of vision and purpose and sustains organisational values across the group and in all our geographies

3 Labour

3.1 Global Compact Principles

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

3.2 Relevant GRI Indicators:

Management approach is described in the GRI Table

GRI G4

3.3 Assessments, policy and goals

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 engaged to date have all signed the Supplier Code of Conduct. The dissemination and sign off on of the Supplier Code of Conduct by all our suppliers will be undertaken over a two year period.

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*

* Reflect policies published in the reporting period

3.3.1 Union membership:

61% per cent of the group's employees are members of a union (2014: 67%). In South Africa, our employees are members of the following unions:

- Food and Allied Workers Union,
- Trawler and Line Fishermen's Union
- National Certificated Fishing and Allied Workers Union, and the
- United Democratic Food & Combined Workers Union.

In Namibia the unions are:

- Namibia Food and Allied Workers Union and
- Namibia Transport and Allied Workers Union.

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.

3.3.2 Measurement of Outcomes

In South Africa, Oceana's employees are members of Food and Allied Workers Union (FAWU); the Trawler and Line Fishermen's Union (TALFU); the National Certificated Fishing and Allied Workers Union (NCFAWU); and the United Democratic Food & Combined Workers Union (UDF&CWU). The Namibian unions are the Namibia Food and Allied Workers Union (NAFAU) and the Namibia Transport and Allied Workers Union (NATAWU). Despite the tough economic climate and increased industrial action in the unionised environment across South Africa, we have successfully concluded wage negotiations throughout the group. This year the expectations from labour were extremely high, which made for a challenging set of negotiations. There were no days lost to strike action during the year.

Wages and conditions of work are negotiated through industry bodies. In the pelagic and lobster sectors, negotiations are conducted through the South African Pelagic Fish Processors Association, and in the demersal and mid-water trawl through the Fishing Industry Bargaining Council, which consists of Deep-sea, Mid-water and Inshore Trawling Chambers. Calamari Fishing Proprietary Limited is involved in the squid industry's statutory council and is an active member of the Employers Organisation for the Cephalopod and Associated Fisheries, which is an employers' association for the industry.

As an indication of the sound relationship the organisation has with the unions, Oceana has enjoyed positive support from the Food and Allied Workers Union and other local stakeholders, in successfully resolving the challenges the organisation faced in the Hout Bay area, which could have led to the closure of the Lucky star Fish meal factory in Hout bay.

We continue to place an important focus on the Oceana Empowerment Trust (the Trust), and engage regularly with Trust beneficiaries. The ten Trust champions whom we have

provided training to meet on a quarterly basis with the CEO and executive directors to review and address the key issues facing the business and to discuss issues that may be of concern to beneficiaries

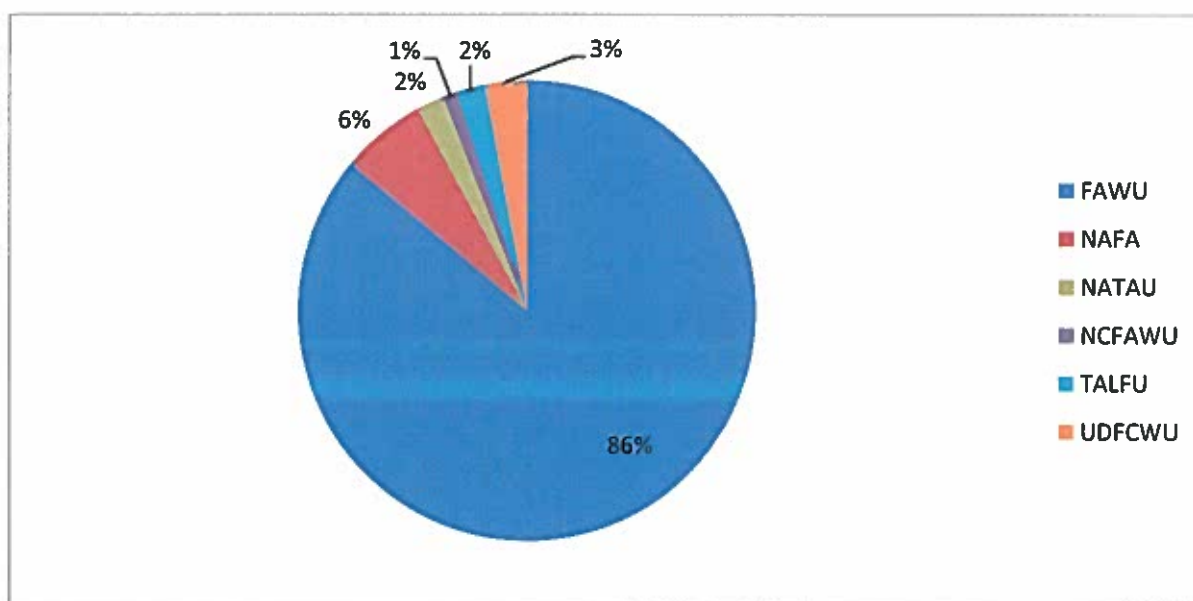
Significant progress has been made in terms of meeting the requirements as detailed in the 2014 compliance assessment. We have commenced with emergency training appropriate to the land and sea vessel facilities associated with our business.

The staff consultative forums have evolved and now address grievance management, disciplinary procedures and measures to address inappropriate behaviour in the work environment.

No litigation pertaining to discrimination, anti-union practices or alleged human rights violations were lodged against the group during the year. No incidents of human rights abuses were made against the company during the year. Labour turnover for 2015 was 7.1% which is below the South African national average of 10.7%.

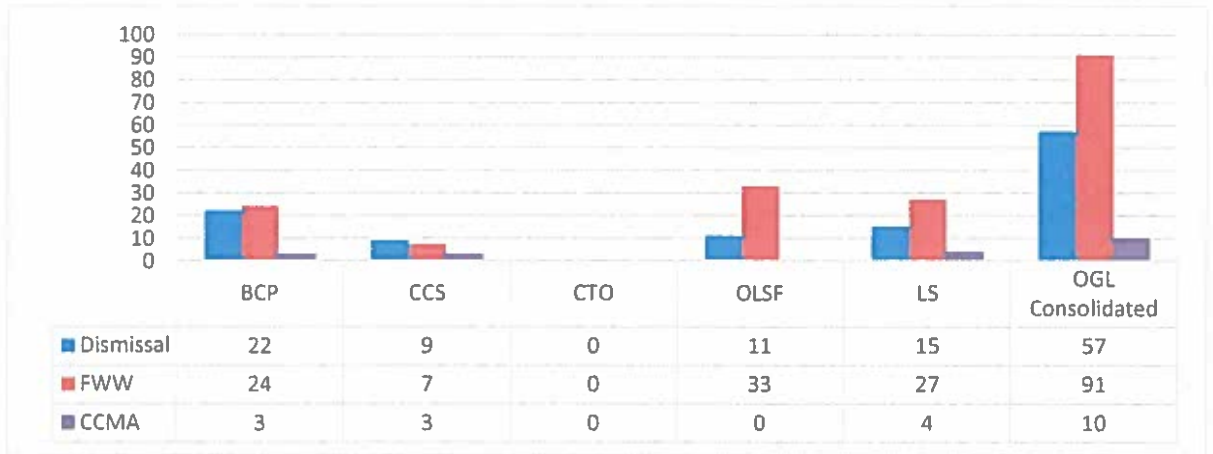
3.3.3 Union membership

The graph below depicts the union membership by percentage across the group.



3.3.4 Overall Headcount

At year-end, we had 6 053 employees, of whom 4 399 were directly employed. Our annual voluntary labour turnover was 3.3% and we had zero days lost to industrial action at our operations.



The graph above reflects that dismissals referred to the Commission for Conciliation Mediation and Arbitration (CCMA). With regards to our Lucky Star operations, some dismissals have been attributed to incidences of absenteeism due to illness. Substance abuse is closely monitored. In relation to drug abuse, we have had nine dismissals during the year. Interventions include random drug testing and return to work interviews as well as training on drug awareness and the management thereof. In relation to alcohol abuse, we detect this through random testing and through assessments in line with the relevant policy.

4 Environment

4.1 Global Compact Principles

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

4.2 Relevant GRI Indicators

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

4.3 Assessments, policy and goals

Commercial fishing is pivotal to Africa's development. Marine resources, where they are properly managed are renewable and accessible. That fish protein is healthy and affordable source of food protein. Further that the fishing value chains offer opportunities for inclusive growth and employment at variable skill levels, in towns and cities as well as isolated coastal villages on the African continent.

We believe large companies afforded the right to fish must prove their ability to turn these rights into broad-based socio and economic value – safely, inclusively and sustainably.

Oceana recognizes that the fishing practices it undertakes today will have a long-term impact on future generations and that its operations impact significantly on the environment. We therefore have an environmental policy which takes into account our commitment to sustainable development and the concept of continual improvement. The company's environmental policy is reviewed and updated annually and is available on our website.

Promoting an Ecosystems Approach to fishing (EAF) is critical to enhancing our global competitiveness, ensuring long-term sustainability and maintaining our ability to create value for all our stakeholders. The implementation of an EAF in South African fisheries has a two pronged approach:

- conserving the structure, diversity and functioning of ecosystems through management actions that focus on the biophysical components of ecosystems, such as the introduction of protected areas; and
- ensuring sound fisheries management practices that meet the goals of satisfying societal and human needs for food and economic benefits through management actions that focus on the fishing activity and the target resource.

We have thus partnered and funded initiatives in association with the Responsible Fishing Alliance (RFA) and World Wildlife Fund. We are a founding member of the RFA, whose vision is to create the framework for like-minded organisations to work together to ensure that healthy marine ecosystems underpin a robust seafood industry in southern Africa.

Protecting the marine resources we harvest is fundamental to the sustainability of our business. We commission and publish independent scientific studies relating to the marine resources that we harvest which include: West Coast Rock Lobster, South Coast Rock Lobster, Small Pelagic, Hake and Horse Mackerel in South Africa and Namibia, which can be found at <http://www.oceana.co.za/corporate-responsibility/scientific-reports> .

Oceana has set both short term and medium term performance targets to guide our focus towards reducing our environmental impact.

KEY PERFORMANCE AREA	TARGET	BASE YEAR
GHG Emissions (Scope 1 and 2)	5% product GHG emission intensity reduction from base year	Sept 2016 Sept 2013
	Further 2,5% product GHG emission intensity reduction year-on-year from 2016 to 2018	Sept 2017 Sept 2018 Sept 2016
Energy	5% product energy intensity reduction from base year	Sept 2016 Sept 2013
	Further 2,5% product energy intensity reduction year-on-year	Sept 2017 Sept 2018 Sept 2016
	5% electricity per unit area intensity reduction from base year by Oceana Group Corporate Office	Sept 2016 Sept 2013
	Further 2,5% electricity per unit area intensity reduction year-on-year by Oceana Group Corporate Office	Sept 2017 Sept 2018 Sept 2016
Water usage and disposal	2,5% product water usage intensity reduction from base year	Sept 2016 Sept 2013
	Measurement and reporting of quantity and quality of effluent	Sept 2015
Waste disposal	Ensure that no food that is fit to eat (by humans or animals) is sent to landfills.	Sept 2014
	Measurement and reporting of quantity and quality of waste	Sept 2015

4.4 Measurement of Outcome

We have maintained a strong focus on promoting responsible fishing practices and driving our zero tolerance to illegal and unregulated fishing. We continue to partner with government and others to promote an ecosystems approach to fishing (EAF), facilitating appropriate research and investing in training staff on the importance of sustainable fisheries.

This was the sixth year in which we participated in the CDP (formerly known as the Carbon Disclosure Plan) and Oceana was awarded a score of 98%, improving the previous year's score by 1%. In comparison to the rest of the companies within the Consumer Staples Sector that participated in CDP 2015, we achieved the highest disclosure score. Oceana's 2015 carbon footprint assessment was conducted by GCX Africa and verified by an auditing firm, Moore Stephens.

We have incorporated our climate change risks, extracted from the climate change risk and vulnerability study which Oceana commissioned, into the functional environmental risk register and overall strategic risk register for the Oceana Group.

Each year we commission independent environmental audits of our land-based facilities and vessels. Targets for 2014 required an overall average score of 85%, and a minimum score of 65% for each element in the audit. This year all the audited facilities met the overall and minimum score. An average score of 93% was obtained for the land based facilities. This is down by 3 percentages when compared to the 2014 scored (2014:96%). The decrease is largely as a result of the additional ISO 14000 environmental management system requirements and the limited timeframe associated with developing and implementing the changes.

Please refer to the group results in Table 2.

**OCEANA GROUP LIMITED F2014-2015
DIVISIONAL AVERAGE ENVIRONMENTAL AUDIT RESULTS**

Oceana Group	ADMIN & RECORDS		WATER QUALITY MANAGEMENT		WASTE MANAGEMENT		HAZARDOUS MATERIALS MANAGEMENT		AIR QUALITY MANAGEMENT		LAND QUALITY MANAGEMENT		PACKAGING		ENERGY		AVERAGE	
	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR	PREV	CUR
Lucky Star	98	95	100	99	91	100	97	100	99	100	100	100	100	100	100	100	98	97
Lobster, Squid, Fries	90	75	99	98	95	99	100	100	92	100	100	97	100	100	100	100	94	85
CCS Logistics	97	90	90	96	98	97	97	100	100	100	100	100	100	100	100	100	97	93
AVERAGE	95	89	94	97	96	98	98	100	98	100	100	99	100	100	100	100	96	93

Table 2: Group Environmental Assessment Results

The fishing sector is highly regulated and our ability to access fishing rights is largely dependent on adhering to the regulatory requirements associated with the industry. To this end, during the review period we have engaged with the following key parties and legislative processes in South Africa:

- the Department of Agriculture Forestry and Fisheries (DAFF) on legislative and policy changes to the Long Term Rights Allocation Process, 2015; the ecosystems approach to fishing and Operation Phakisa, a Presidential initiative;
- Department of Environmental Affairs (DEA) on greenhouse gas (GHG) reporting regulations;
- DEA on the coastal water discharge permit application process, on waste reporting and registration requirements; on air emission reporting and registration requirements;
- Department of Trade and Industry, and the office of the Presidency on Operation Phakisa, in particular on the ocean's economy progress report;
- DEA and Development Planning regarding applicability of environmental authorisation for operational modifications within our factories in terms of Environmental Impact Assessment Amendment Regulations, 2014.

In Namibia, we engaged the Ministry of Environment and Tourism, obtaining environmental clearance for the following:

- a fishmeal plant with lowered odour emissions and improved scrubbing with chlorine dioxide control, expected to be implemented in 2016;
- the extension of our freezer facilities, expected to be implemented in 2016/17;
- moving and upgrading of our plant for effluent treatment and improved process control, expected to be implemented in 2016;
- a proposed new ten ton HFO (heavy fuel oil) boiler, which is expected to emit reduced levels of emissions;

99.5% of our targeted harvested commercial fish are on the South African Sustainable Seafood Initiative (SASSI) green list. All but two of our harvested resources (west coast rock lobster and sole) fall within the green category of the SASSI list. This means that our consumers benefit from the most sustainable seafood choices, the healthiest and most well-managed fish populations, and from that the species can sustain current fishing pressure.

The west coast rock lobster remains on the orange list due to resource stock levels. The Total Allowable Catch (TAC) for this resource has been reduced year-on-year since 2006, with a marginal increase in 2009 and 2012, to allow for the resource to recover to sustainable levels. The final agreed TAC contained a constraint of an 11% change in the TAC from one year to the next; the TAC for next year is therefore expected to have a maximum of 11% variance to ensure recovery of the resource. Oceana operates in strict accordance with regulatory controls to ensure the sustainability of the resource. These controls include

adhering to a minimum carapace length, no fishing during the closed season, complying with our catch limits and a prohibition on catching females in berry or soft-shelled specimens. The right to harvest sole was acquired with the Lusitania acquisition in 2012; none of the sole-related rights were exercised in 2015.

South African Commercial Fishing	SASSI category
Anchovy	Green
Pilchard	Green
Squid	Green
South coast rock lobster	Green
Horse mackerel	Green
Deep sea hake	Green
Sole	Orange
West coast rock lobster	Orange

To deliver on our strategy of being an efficient converter of rights into shared value, we maintain a strong focus on responsible fishing practices and encouraging an ecosystems approach to fishing. We harvest our allocated marine resources responsibly by promoting a zero tolerance to illegal and unregulated fishing and partner with government and others to promote an ecosystem and sustainable approach to fishing, including facilitating research and training staff. We also monitor and manage our operational impact on the environment.

We annually train seafaring employees on the regulations, policies and management measures in place to uphold responsible fishing practices. Oceana has trained 278 seafaring employees between 2013 and 2015, representing almost half of all applicable employees.

Oceana conforms to the requirements of two, strategic certification bodies: the Marine Stewardship Council (MSC) and the International Fishmeal and Fish Oil organisation (IFFO). Our hake operation has the MSC custody of chain certification, which is considered the world's premier eco- labelling initiative for fishing. The MSC certification is renowned for its rigorous environmental and responsible fishing and supplier requirements. The fishery was initially certified in 2004 and we retained the certification over subsequent certification periods. Our Lucky Star operations maintained their IFFO-RS (Responsible Sourcing) certification and we undertook a compliance audit in August 2015 at all of our fishmeal factories. The compliance audit is a prerequisite for the IFFO certification.

5 Anti-Corruption

5.1 Global Compact Principles

Principle 10

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

5.2 Relevant GRI Indicators:

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

5.3 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 within its operations. Policies, procedures and internal controls are geared towards entrenching ethical practices throughout the group.

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

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

The group's code of business conduct and ethics is distributed to all new employees on joining the group and there are regular refresher sessions that addresses the key items 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.

5.4 Measurement of Outcome

Compulsory training was arranged for all employees with computers and internet access on Oceana's Code of Business Conduct and Ethics, and Oceana's Compliance Policy. All new employees are obliged to undergo this training.

A total of 77 employees completed the training in this reporting period. In the new financial year compliance training will continue with new eligible and promoted employees in respect of competition law, code of business conduct and ethics and Anti-bribery and Corruption (incorporating the respective policies).

The Whistle Blowers programme is part of this training. The objectives of the programme are centred on rooting out fraud, corruption and unethical practices, Whistle Blowers, an independent information gathering company, is available for employees, contractors, suppliers, customers and the public to report illicit activity without repercussion to the whistle blower. A national toll-free number is used to anonymously report any known or suspect inappropriate practices. The whistle blowers facility details are on the Oceana website.

Oceana has reviewed and updated its Anti-bribery and Corruption policy by way of a supplementary policy dealing with Global Anti-corruption and Bribery.

During the year and by means of the Whistle Blowers programme, a total of 58 calls were received requiring no action, two matters were reported requiring investigation and no evidence of fraud were discovered.

5.4.1 Continual Improvement Commitment

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

17 December 2015