

# UNITED NATIONS GLOBAL COMPACT

## COMMUNICATION ON PROGRESS

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15 December 2018

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.

**REGISTERED COMPANY NAME:** Oceana Group Limited **REGISTRATION NUMBER:** 1939/001730/06

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## 1 INTRODUCTION

The Oceana Group's mission statement is to be the leading empowered African fishing and commercial cold storage company by:

- responsibly harvesting and procuring a diverse range of marine resources;
- promoting food security by efficiently producing and marketing relevant products for global markets;
- actively developing the potential of all employees; and
- investing in communities where we operate

thereby consistently providing superior returns to all stakeholders.

Our mission statement is aligned to our commitment to shared value creation as well as the principles of the United Nations Global Compact (UNGC). In addressing this year's challenges; our continuing commitment to turning fishing rights into shared value through our operations has remained the same.

Our sustainability strategy is necessarily an integrated one, with critical societal and natural resource commitments a highlight of our five strategic business objectives. We have expanded and deepened our focus on these commitments. Our response to key societal challenges accordingly forms the basis of Oceana's sustainability strategy and provides the framework for our annual sustainable report. Through our people, technology and know-how, our fleet and equipment, our financial resources, and our positive relationships with critical stakeholders, we deliver significant value from a renewable natural resource. By reinvesting this value in the capitals upon which our business depends, we maintain our capacity to create value into the future.

# OUR STRATEGIC OBJECTIVES



**Figure 1:** Sustainability Strategy Objectives

In addition to addressing environmental, social and governance (ESG) risks, Oceana's sustainability strategy addresses opportunities to: i) empower people through training, equity and remuneration; ii) reduce costs through enhancing environmental efficiencies; iii) help smaller enterprises grow into sustainable businesses; and iv) support the sustainable development of vulnerable coastal communities.

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

This report presents progress with our implementation of the UNGC principles and reflects our strategy on initiatives that are enhancing local production, increasing employment and meeting the growing demand for affordable protein.

## 2 UNGC SELF-ASSESSMENT

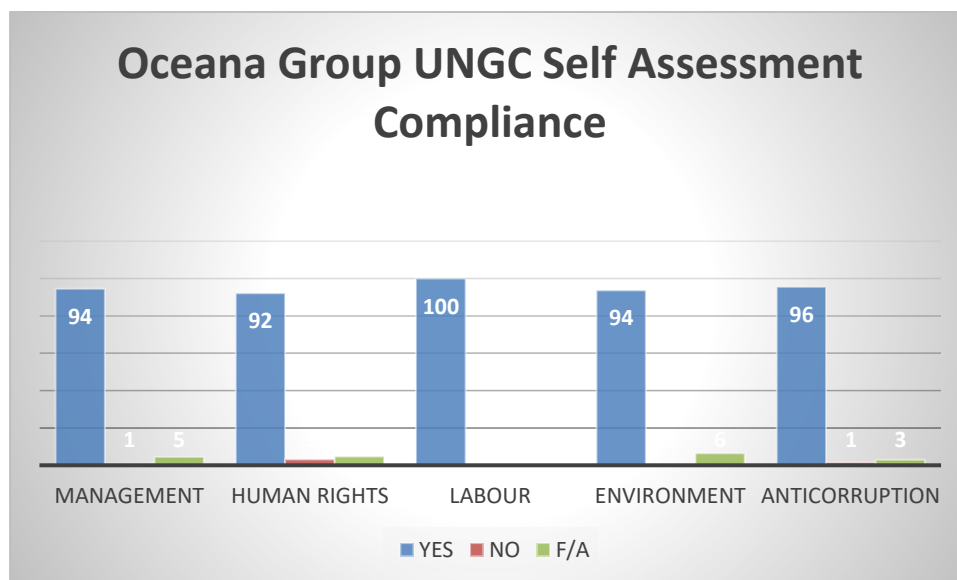
Oceana Group’s compliance with the UNGC principles in 2018 has been assessed using the Global Compact Self-Assessment tool. The table below reflects our compliance with the five main sustainability categories namely; management, human rights, environment, anti-corruption and labour.

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

### 2.1.1 Assessment methodology

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

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



**Figure 2:** Oceana Group 2018 UNGC Self-Assessment Results

### 3 HUMAN RIGHTS

#### 3.1 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 |
|-------------|--|

#### 3.2 Measurement of Outcomes

The Oceana Group achieved a 2018 UNGC compliance self-assessment compliance score of 92%.

##### 3.2.1 Human rights

This year saw a slight (1%) increase in our compliance with the UNGC principles in comparison to FY2017.

Respect for human rights is an integral part of Oceana’s code of ethics and values. Our human rights policy aims to promote equality of opportunity and combat discrimination. The policy is applied across all our operations in Angola, Namibia, South Africa and the United States. The policy commits us to strive for full compliance with applicable legislation in the regions in which we operate, as well as to implement the human rights principles set out in the UNGC.

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

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

##### 3.2.2 Occupational health and safety

To mitigate the inherent health and safety risks associated with our land- and sea-based activities, we implement safety monitoring, training and enforcement programmes, provide relevant personal protective equipment, ensure effective incident tracking and investigation, and undertake periodic safety audits on all sites and vessels. Health and safety training programmes include firefighting (all levels), first aid (all levels), safety handling of winches and lifting,

competence in survival craft, GMP and HACCP, OHASA, pre-sea training, safety officer training, personal safety training and personal surviving techniques.

The managing directors of all operating divisions are responsible for ensuring full compliance with relevant occupational health and safety legislation, and that the required structures are in place. We offer our employees access to an employee assistance programme (EAP), which is extended to families of the staff.

Compliance with the health and safety component of the external audits for all land-based facilities was 97% (2017: 98%) and 97% for all vessels (2017: 98%). We have seen a pleasing decrease this year in the number and severity of safety incidents recorded at Oceana: the group's disabling injury frequency rate (DIFR) of 1.03 was once again well below the group margin ceiling of 2.0. Once again there were no occupational fatalities this year.

### **3.3 Continual Improvement Commitment**

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

Our commitment to the continual improvement with our compliance to the UNGC human rights principles is embodied in the following initiatives proposed for implementation in the 2019 reporting period.

- Develop a programme and action plan to audit key supplier compliance with Oceana's Supplier Code of Conduct and Human Rights Policy.
- Attend to the monitoring of protection of personal information measures in line with the Protection of Personal Information Act, No 4 of 2013.



## **4 LABOUR**

### **4.1 Global Compact Principles**

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

### **4.2 Measurement of Outcomes**

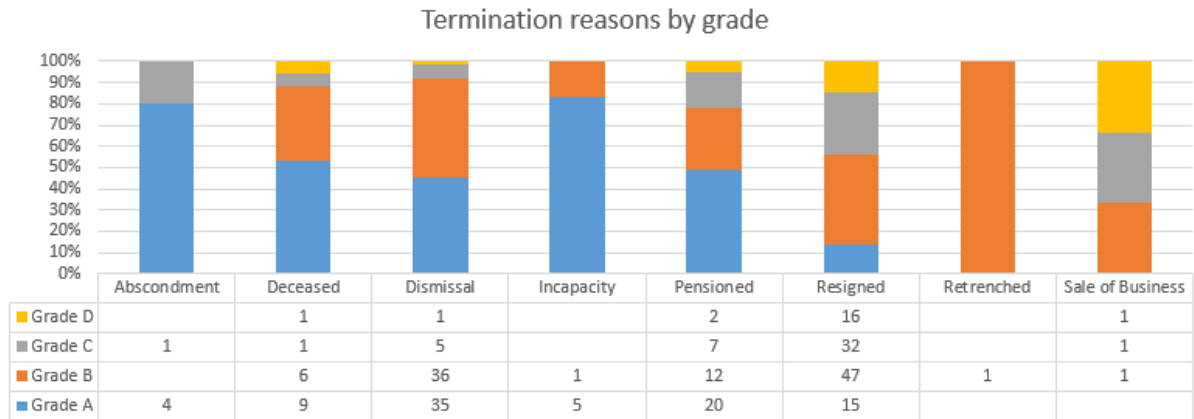
#### **4.2.1 Providing a positive place to work**

Promoting job security and being a leading employer in our industry remain particular priorities in our South African and Namibian operations, where unemployment rates are high. Following the adoption of our frozen fish import strategy, we provide enhanced work-days and a more stable income to our seasonal employees, being one of very few companies in the sector that provides minimum guaranteed hours to seasonal employees. Only CCS Logistics continues to use labour brokers, and we ensure that every agency used by that division has signed our supplier code of conduct, requiring compliance with all labour and human rights legislation.

In our Daybrook operation, we have continued to work on integrating and aligning their human resource policies and practices, and reward and benefit structures, with those of the group, while also ensuring full compliance with local legislation. Given the importance of attracting and retaining technical skills in the comparatively isolated area, we give particular attention to improving employee benefits.

We believe that the quality of the relationship between management, employees and labour unions across our operations is reflected both by our low employee turnover rate of 7.1%, and by the fact that we have lost only one day to industrial action over this reporting period.

The Group Headcount has continued to show a decrease in the 2018 financial year. A loss of 383 in overall headcount is recorded. The permanent staff termination reasons were driven by 41% resignation, 28% dismissals, 14% retirements and 6% deaths.



**Figure 3:** 2017 Labour turnover percentages per category

#### 4.2.2 Labour policy and procedure framework

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

The following policies are in place and available to employees:

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

#### 4.2.3 Union membership

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

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

South Africa:

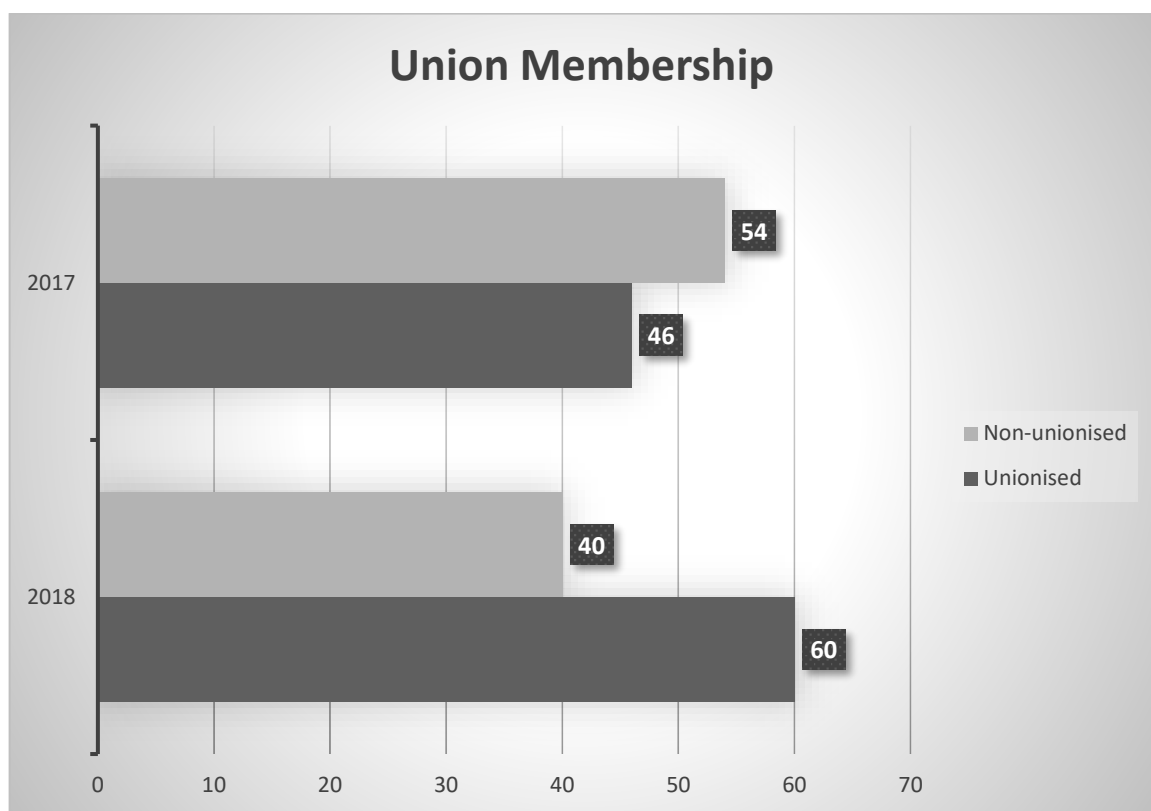
- Food and Allied Workers Union (FAWU)
- Trawler and Line Fishermen’s Union (TALFU)
- National Certificated Fishing and Allied Workers Union (NCFAWU)
- United Democratic Food and Combined Workers Union (UDF&CWU)

Namibia:

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

Industry bodies that negotiate wages and conditions on our behalf:

- Fishing Industry Bargaining Council (deep-sea, mid-water and inshore trawling chambers)
- Employers Organisation for the Cephalopod and Associated Fisheries



**Figure4:** Union versus Non-union members

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

#### 4.2.4 Transformation and localisation

This year, we achieved a level 1 rating in terms of the requirements of the Broad Based Black Economic Empowerment (B-BBEE) requirements, with a score of 102.58 points out of 109, as compared with 96.8 in 2017. We also maintained a recognition level of 135% for procurement in terms of the DTI’s B-BBEE Scorecard. B-BBEE is a South African government policy to advance

economic transformation and enhance the economic participation of black people (African, Coloured and Indian people who are South African citizens) in the South African economy.

As part of our drive to empower, equip and transform in Namibia, Erongo Marine Enterprises has introduced a broad-based economic empowerment scheme for approximately 150 Namibian permanent employees. Launched in November 2017, the Erongo Marine Harambee Workers Trust was set up exclusively for the Namibian nationals employed by the company, most of who are employed as crew aboard the company’s two horse mackerel midwater trawlers.

We continue to closely monitor legislative and policy developments, and to engage with policymakers and regulators, to ensure that our long-standing empowerment activities have been clearly communicated and that our ongoing transformation activities are sufficiently aligned with government’s expectations.

#### 4.2.5 Skills development

Ensuring and retaining access to the best available skills remains a critical challenge and strategic focus area for the business. Our strategic focuses are on making the seafood sector attractive to emerging talent, developing the depth and breadth of Oceana’s management team and embedding a strong performance-based culture across the workforce.

We invested R21.9 million this year on employee skills development in South Africa and Namibia (2017: R22.2 million), building critical skills in such areas as marine science, vessel crewing, artisans, supply chain management, IT, finance, and food safety, quality and processing. We launched the first phase of our Maritime Academy, aimed at developing skills and building a talent pipeline of local seagoing employees. The Academy will be developing maritime skills at all levels, from factory hands and deck hands, through to junior and senior officers, and skippers. Ten NQF2 National Certificate in fishing operations Learnerships were completed in 2018.

| <b>TRAINING SPEND - SA and Namibia</b>           | <b>2018</b> | <b>2017</b> |
|--|-------------|-------------|
| Total amount invested in Skills Development (Rm) | R22 mil     | R22.2 mil   |
| Total spent on black employees                   | R 19.9      | R 20.6      |
| Number of employees who received training (%)    | 91.4        | 92          |

**Table 1:** 2018 Skill Spend

| <b>INITIATIVE</b> | <b>DISCIPLINE</b>  | <b>NUMBER OF PARTICIPANTS</b> | <b>NATURE OF PARTICIPANTS</b> |
|-------------------|--|-------------------------------|-------------------------------|
| Apprenticeships   | Fitter and Turner  | 1                             | Employed                      |
| Internships       | Chemical Engineering, Electrical Engineering, Environmental, Human Resources, Mechanical Engineering, Operations | 12                            | Fixed Term Contract (FTC)     |

| INITIATIVE   | DISCIPLINE  | NUMBER OF PARTICIPANTS | NATURE OF PARTICIPANTS  |
|--------------|---|------------------------|---|
| Learnerships | Business Administration (NQF4),<br>Domestic Serviced (NQF1),<br>Environmental Practice (NQF2),<br>Hygiene and Cleaning (NQF1),<br>Fishing Operations (NQF 2),<br>Manufacturing Management (NQF 4) | 146                    | 121 are employed on a FTC and 25 are Permanent employees and 81 are Disabled. |
| Graduates    | Finance, HR and IT, Environment, Customer Service   | 7                      | FTC   |

**Table 2:** Development Programmes (Graduates/Apprentices/Interns/Learnerships)

In this reporting period, we offered environmental learnerships at our Lucky Star operations to employed staff as well as members of the surrounding communities in Hout Bay and Laaiplek. With funding from the SETA, 39 learners are currently enrolled, of which 20 participants are unemployed. The Environmental Practice Learnership (NQF2) modules include environmental awareness and responsibilities in the organisation; waste management; water course cleaning, care and maintenance; data collection and statistics; leadership skills; and health and safety management. The learners have demonstrated enthusiasm and commitment. Environmental sustainability is a focus of site induction training and we look forward to employees receiving their certification and becoming environmental champions for their respective sites.

#### 4.3 Continual Improvement Commitment

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

## 5 ENVIRONMENT

### 5.1 Global Compact Principles

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

### 5.2 Measurement of Outcome

The 2018 compliance assessment revealed 94% compliance with the requirements of the environment component on the UNGC.

We monitor and manage our material environmental risks and impacts of our operations through our ISO 14001-aligned environmental control system (ECS). We assess our environmental risks and progress with mitigation measures quarterly. Our current top 10 risks and ranking – identified below – are in line with international trends.

1. Marine resource availability
2. Pollution potential as a result of our activities
3. Fresh water availability
4. Climate variation
5. Irresponsible environmental management practices
6. Unsustainable supplier practices
7. Sea water availability
8. Carbon tax impacts
9. Impact of ocean mineral, gas and oil extraction
10. Energy security, water usage and waste disposal across the group.

#### 5.2.1 Marine resource management

As a fishing company Oceana has always appreciated that its profitability as a business depends on the viability of its renewable fishing resources, and the health of the broader marine environment. Our commitment to harvesting marine resources responsibly is based on the following practices:

- promoting responsible fishing practices across the supply chain by engaging with international suppliers and promoting awareness amongst all our seafaring staff;

- supporting an ecosystem approach to fisheries management by engaging with government and industry bodies, funding research and participating in industry workshops, and
- ensuring full legal compliance in our highly regulated operating environment.

Oceana has a zero tolerance approach to illegal, unreported and unregulated fishing, recognising that this undermines collective efforts to conserve and manage fish stocks, negatively impacts food security, and ultimately reduces social and economic opportunities.

## **5.2.2 Sustainable seafood**

### **5.2.2.1 South Africa**

The majority (80%) of our harvested commercial fishing rights by volume are on the green list of the South African Sustainable Seafood Initiative (SASSI). These species have been assessed as the most sustainable choices, coming from the healthiest and most well-managed fish populations.

We continue to engage with industry bodies, government officials and other stakeholders in efforts to improve the sustainability of applicable resources, including through participating in the development of the WWF-SA/DAFF Horse Mackerel Conservation Improvement Project. West Coast rock lobster (WCRL) remains in the red category, reflecting concerns regarding the decline in the health of the population and the impact of poaching and ecosystem decline. We are supporting efforts to find an appropriate long-term solution that balances the need to protect the biomass with the desire to promote small-scale fishers.

Our hake operation retained its Marine Stewardship Council (MSC) chain of custody certification, considered the world's most rigorous eco-labelling initiative for fishing. This year, our five fishmeal operations once again retained their certification in terms of the International Fishmeal and Fish Oil organisation (IFFO) Global Standard for Responsible Supply (IFFO-RS).

### **5.2.2.2 Namibia**

The Namibian horse mackerel stock is managed primarily through a total allowable catch (TAC). Most of this is allocated to the mid-water trawl fishery, with a small proportion made available for value-added products (mainly through canning), in factories owned by purse seine operators. Currently, the stock is assessed using an age-structured production model (ASPM), which incorporates the age distribution and biomass estimates from research surveys together with commercial data. The 2016 assessment indicated that the stock was above the maximum sustainable yield (MSY) level and that recruitment for 2016 was estimated to be above the long

term. In December 2017, the Namibian government implemented a three-year moratorium on pilchards catches.

#### 5.2.2.3 United States

The fish resource utilised at our Daybrook fishmeal facility is managed according to a state and industry endorsed Fisheries Management Plan (FMP). The goal of the Gulf menhaden FMP is to provide a management strategy that allows an annual maximum harvest, while ensuring the protection of the stock from overfishing.

According to the Gulf Menhaden Stock Assessment, completed for the Gulf States Marine Fisheries Commission in 2016, the existing fisheries management plan is meeting its objectives as the Gulf of Mexico menhaden stock is “not experiencing overfishing and is not overfished”.

#### 5.2.2.4 Angola

In Angola, the offshore Sardinella fishery is a major fish resource and an important source of food, as well as a major employment avenue for the coastal population. The resource is largely managed on the basis of biomass estimates of the adult stock, obtained by standard hydro acoustic methods.

### 5.2.3 Water resilience

This year we placed an emphasis on addressing a top environmental risk – fresh water availability. In response to heightened water scarcity concerns in the Western Cape, South Africa in 2017, we have taken decisive steps to reduce our usage of potable water by 40% in the short-term, based on our FY 2017 consumption. This includes realising opportunities for alternative water sources – including, where feasible, substituting potable water with seawater – as well as implementing water-use efficiency measures. Given the scale of the water crises, in 2018 the Oceana Board agreed to invest R35 million in two desalination plants, which have made a significant contribution to enhancing water security, both for the company and the neighbouring communities.

Our municipal potable water usage per unit of activity decreased to 0.5 kℓ per ton of product produced or stored and handled, compared to 1.08 kℓ in 2017, and our absolute potable municipal water consumption decreased by 44%.

### 5.2.4 Waste management

Our target is to ensure that no food that is fit for human or animal consumption is sent to landfills, but instead is directed to our fishmeal processing facilities.



Our principal initiative is the processing of horse mackerel not suitable for the frozen fish market and cannery offal (fish heads, tails and guts) into fishmeal. We steadily increase the volume of waste directed to recycling initiatives and continue to identify and implement recycling and reuse initiatives across the business, to reduce the volume of waste that is sent to landfill. We seek to ensure that all waste for landfill is suitably disposed of at a licensed landfill site.

### 5.2.5 Climate Change management

We have ongoing initiatives to improve energy efficiency at our land-based facilities and vessels. Achieving intensity savings this year of 6% and 28%, respectively, in comparison to FY2107. The group monitors its CO2 emissions in absolute terms, and per unit of normalised activity. During 2018, absolute emissions decreased by 0.5%. The group GHG emission intensity reduced by 1% at our land-based facilities and by 20% on our vessels, compared to our base year of 2016. The reduced intensity at the land-based facilities can be attributed to the production efficiency measures, together with the increased production throughput.

### 5.3 Environmental Performance Targets

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

| NDP / SDG supported | Key performance area          | Target   | Target date            | 2017 performance against targets  |
|---------------------|-------------------------------|--|------------------------|---|
| SDGs: 13, 12        | GHG EMISSIONS (SCOPE 1 AND 2) | 2,5% product GHG emission intensity reduction year-on-year from 2016 to 2018 | Sept 2017<br>Sept 2018 | 1% GHG emission intensity reduction in land-based facilities.<br><br>20% decrease in GHG emission intensity in vessels. |
|                     |                               | Develop and implement science based GHG reduction targets                    | 2020                   | Within target range.  |
| SDGs: 12, 13        | Energy                        | 2,5% product energy intensity reduction year-on-year                         | Sept 2017<br>Sept 2018 | 8% reduction in product energy intensity  |

| NDP / SDG supported | Key performance area     | Target  | Target date            | 2017 performance against targets   |
|---------------------|--------------------------|---|------------------------|--|
|                     |                          | 2,5% electricity per unit area intensity reduction year-on-year by Oceana Group Corporate Office  | Sept 2017<br>Sept 2018 | 5% increase in electricity per unit area intensity   |
| SDGs: 6,14,12       | Water usage and disposal | 5% -10% product water usage intensity reduction from base year  | Sept 2020              | 44% absolute potable water consumption reduction   |
| SDGs: 15,12         | Waste disposal           | Zero waste that is fit for human consumption directed to landfill   | 2020                   | Within target range?   |
|                     | Promoting food security  | Contribute to ensuring the transition of red listed commercial fish species to an orange listing and to transition orange listed commercial fish species to green listed.   | 2020                   | 80% of our targeted commercial fishing rights on the SASSI green list.   |
|                     |                          | All our targeted wild-caught fish resources will be sourced from fisheries that are undertaking an industry and DAFF approved credible, time-bound improvement project where they are not WWF-SASSI green-listed, or caught from MSC (or equivalent) certified fisheries. | 2025                   | 80% of our targeted commercial fishing rights on the SASSI green list.<br><br>Our hake operation once again retained its Marine Stewardship Council (“MSC”) chain of custody certification, considered the world’s most rigorous eco-labelling initiative for fishing.<br><br>Oceana’s five fishmeal operations also retained their certification in terms of the International Fishmeal and Fish Oil Organisation Global Standard for Responsible Supply (IFFO-RS). |

**Table 3:** Medium-term targets overview

#### **5.4 Continual Improvement Commitment**

In 2019 we intend to continue focussing on the application of our existing policies and procedures across the group, particularly in our Angolan operations.

In addition, areas for improvement and action include improved water and waste management and reporting.

## 6 ANTI-CORRUPTION

### 6.1 Global Compact Principles

#### Principle 10

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

### 6.2 Measurement of Outcome

The 2018 self-assessment resulted in a compliance score of 99% with the anti-corruption UNGC requirements. All eligible new employees continue to undergo comprehensive training on Competition Law. Additionally, all eligible employees received and completed training on the Anti-bribery and Corruption Policy and related legislation, as well as training on Oceana's Code of Business Conduct and Ethics and the Compliance Policy.

#### 6.2.1 Zero tolerance to fraud and corruption

Of the 68 calls logged on the Whistleblowers line, nine calls required further investigation. It was found that there was no substance to the allegations of eight of the calls. An internal audit was conducted in respect of one of the logged calls. The internal auditors found no evidence of fraud or defalcation, however internal controls have been strengthened in line with the internal auditor's recommendations.

Two reports were made directly to the company and forensic investigations were undertaken in respect of these reports. One investigation is still ongoing whilst the other investigation found no evidence of fraud. Directors and employees are required to observe the highest ethical standards in conducting the group's business. In this regard, the group has a formal code of business conduct and ethics. An anonymous and secure whistle-blowing facility has been in place for many years. Its purpose and anonymity are emphasised at employee induction and training sessions. The facility is also available in Namibia and the United States.

#### 6.2.2 Ethics and compliance framework

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

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

- Human Rights policy and statement

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

### **6.3 Continual Improvement Commitment**

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

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

December 2018