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UNITED NATIONS GLOBAL COMPACT

COMMUNICATION ON PROGRESS

17 December 2016

The United Nations Global Compact is an international initiative that addresses human rights, labour, environmental and corruption issues through a commitment to ten principles derived from the Universal Declaration of Human Rights, the International Labour Organisation's Declaration of the Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption.













Table of Contents

1	Intro	oduc	tion	4
	1.1	UNG	GC self-assessment	5
	1.1.	1	Assessment methodology	6
2	Hum	nan F	Rights	7
	2.1	Арр	olicable Global Compact Principles:	7
	2.2	Rele	evant GRI Indicators	7
	2.3	Mea	asurement of Outcomes	7
	2.3.:	1	Human Rights	7
	2.3.	2	Occupational Health & Safety	8
	2.4	Con	tinual Improvement Commitment	9
	2.4.	1	Human Rights	9
3	Labo	our		11
	3.1	Glol	bal Compact Principles	11
	3.2		evant GRI Indicators	
	3.3	Mea	asurement of Outcomes	11
	3.3.	1	Policy and Procedures	11
	3.3.		Union membership	
			Skills development	
	3.4		tinual Improvement Commitment	
4			nent	
7	4.1		bal Compact Principles	
	4.2		evant GRI Indicators	
	4.2		asurement of Outcome	
	4.3.		Assessments, policy and goals	
	4.4	Con	tinual Improvement Commitment	19

5	Ant	i-Corr	ruption	. 20
	5.1	Glol	bal Compact Principles	20
	5.2	Rele	evant GRI Indicators:	20
	5.3	Mea	asurement of Outcome	20
	- 2	4	Assessments relieved reals	20
	5.3.	.1	Assessments, policy and goals	20
	5.3	2	Continual Improvement Commitment	22
	ر.ي.		Continual improvement commitment	

1 INTRODUCTION

Oceana is committed to turning fishing rights into shared value for all our stakeholders. Giving effect to this core purpose inspires our people and our actions. It is also a challenge that requires our ongoing engagement in the contested ocean economy. Therefore our dependence on living marine resources requires us to develop and sustain strong relationships with local coastal communities.

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

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

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

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

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



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

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

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

Our drive to convert fishing rights into shared value has already become a drive of innovation within the group; by formalising this into a clear strategic framework, we will be in a position to leverage these gains.

This report presents progress with our implementation of the UNGC principles and reflects our strategy on various initiatives that are enhancing local production, increasing employment or meeting growing demands for affordable protein. To address complex societal challenges at scale requires the competence and reach of a global company, as well as local relationships that are grounded in trust and mutual respect. We believe this combination sets Oceana apart.

1.1 UNGC self-assessment

In 2016, we undertook an assessment of our compliance in terms of the requirements of the Global Compact Self-Assessment Tool. The table below reflects our compliance with the five

main sustainability categories; namely, management, human rights, environment, anticorruption and labour.

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

1.1.1 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. Together this team assessed our compliance with the requirements of the assessment tool, identified actions for closure, a responsible person and timeframe.

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

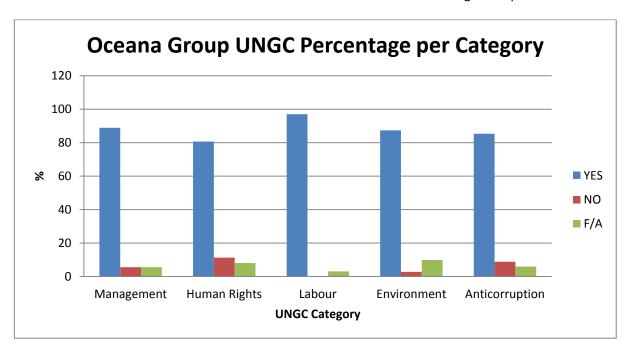


 Table 1: Oceana Group 2016 UNGC Self-Assessment Results

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

2.2 Relevant GRI Indicators

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

2.3 Measurement of Outcomes

During the 2016 UNGC compliance self assessment with the applicable principles, we achieved a compliance score of 89%.

2.3.1 Human Rights

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

Our human rights policy is aimed at promoting equality of opportunity and combating discrimination. The policy is applied across all our operations in Angola, Namibia, South Africa and the United States. The policy commits us to 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 United Nations Global Compact (UNGC)

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 regular staff refresher sessions address key issues. All employees are required to observe the highest ethical standards in conducting the group's business. A customised programme was launched in 2013 to implement the policy across the business.

In 2016, we updated our Human Rights Policy and Statement to reflect our commitment to employees, society and local communities within which we operate. In addition, the revised policy speaks to our commitment to ensuring compliance with our policies throughout our

supply chain. More specifically, the Supplier Code of Conduct was amended in 2016 to reflect our commitment to the prohibition of forced labour as well as fair and reasonable payment of employees.

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

In preparation for the potential minimum wage requirement, Oceana undertook an investigation into our wage categories in relation to the potential minimum wage proposed. We found that our lowest pay salary category was well above the potential minimum wage. Therefore we do provide workers with a salary that could be considered to meet the needs.

2.3.2 Occupational Health & Safety

Managing directors of all the operating divisions are responsible for ensuring full compliance with relevant occupational health and safety legislation. Agreements with the unions in the Lucky Star and BCP divisions cover health and safety issues.

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

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

COMPANY – Sea based	HEALTH AND SAFETY SORE (%)
Calamari Fishing – Squid fleet	97

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

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

The group's disabling injuries frequency rate (DIFR) for 2016 was 0.9 (2015: 0.5). Although there has been an increase in this year's DIFR it is well below the group margin ceiling of 2. We have initiated a strategy to enhance the health and safety awareness which includes training, monthly internal audits and spot fines.

We offer our employees access to onsite occupational health practitioners and medical insurance, as well as an employee assistance programme, which has now been rolled out to all sites. Employees have the opportunity to interact with the Employee Wellness Assistance Programme (EAP) counsellors on various platforms, including emails, call-back SMS and the employee Web portal. Employees have continued to respond positively to onsite counselling and follow up communication. The various EAP interventions provided include financial training, wellness screening and HIV/Aids screening and support. The EAP service is extended to families of the staff, who can call an outsourced helpline to speak to an EAP consultant for trauma counselling, legal and/or financial advice.

2.4 Continual Improvement Commitment

2.4.1 Human Rights

Based on the self assessment undertaken, the area's requiring continual improvement relate to the management of the contracted security services and the human rights compliance assessments within our supply chain.

Our commitment to the continual improvement with our compliance to the UNGC human rights principles is embodied in the following initiatives propose for implementation in the 2017 reporting period.

Develop procedure which details the requirements for PPE access and utilisation.
 Although PPE is worn throughout the operations (where applicable), there is no documented procedure which guides the PPE access and utilisation.

- Develop and implement the overtime management action plan and report on it monthly to Exco.
- Develop a programme and action plan to audit the key suppliers compliance with the Oceana Supplier Code of Conduct.

3 LABOUR

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

3.1 Global Compact Principles

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 as described in the GRI table, 2016
- GRI G4

3.3 Measurement of Outcomes

We remain one of very few companies in the industry that provides minimum guaranteed hours to our seasonal employees in a very cyclical business. Through a change in fish processing strategy this year the group has managed to provide a more stable income to our seasonally employed employees. The management and use of temporary labour remains an important focus. In line with regulatory requirements we continue to reduce our reliance on labour brokers and have in this year converted 61 employees from temporal to permanent employees. Since 2014, Oceana has created more than 300 weeks of additional employment in our canneries, and have ensured all year-round employment for seasonal staff who are now not only paid a basic wage, but also enjoy benefits such as overtime, pension fund contributions, seasonal bonuses and production bonus.

3.3.1 Policy and Procedures

Oceana adheres to all applicable labour legislation within the countries in which we operate. The group does not permit child labour nor does it permit forced or

compulsory labour. The commitment to ensure that no child labour is permitted is being progressively communicated to our supplies and all have signed the Supplier Code of Conduct. The supplier Code of Conduct has been included in our compulsory 'on-boarding' requirements for all new suppliers.

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

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

3.3.2 Union membership

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

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

South Africa:

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

Namibia:

- Namibia Food and Allied Workers Union (NAFAU)
- Namibia Transport and Allied Workers Union (NATAWU)
- Industry bodies that negotiate wages and conditions on our behalf:
- Fishing Industry Bargaining Council (deep-sea, mid-water and inshore trawling chambers)
- Employers Organisation for the Cephalopod and Associated Fisheries

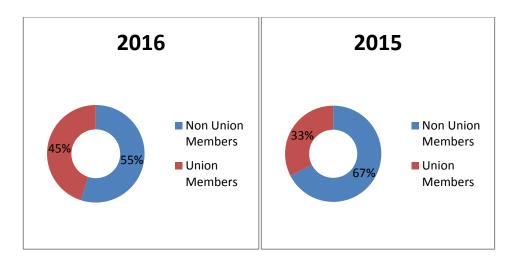


Figure 2: Union membership comparison

We've realised an increase in the number of employees who are represented by the unions reefed to above.

3.3.3 Skills development

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

TRAINING SPEND - SA and Namibia	2016	2015	
Total amount invested in Skills Development	R 33.4 mil	R 17.8 mil	
Total spent as a % of leviable payroll on Black Employees (South Africa)	3.71%	2.51%	
Total spent on Black Employees as a % of Total Amount invested in Skills Development	87%	94.8%	
Total spent on Disabled Employees as a % of Total Amount Invested in Skills Development	7.87%		
Total spent as a % of leviable payroll on Black Disabled Employees (South Africa)	0.34%		
TRAINING SPEND - Daybrook			
Training Spent Daybrook	\$18,923.00.		

Table 3: 2016 Skill Spend

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

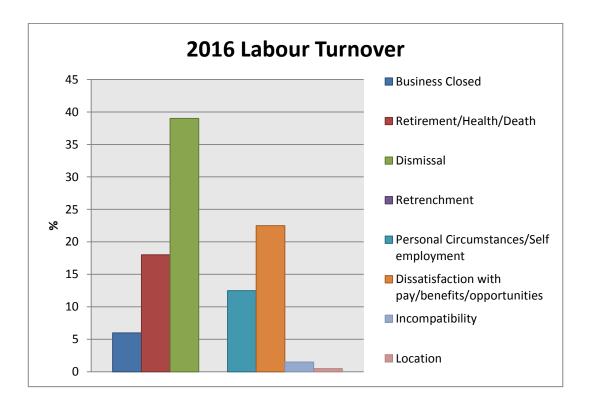


Figure 3: 2016 Labour turnover percentages per category

3.4 Continual Improvement Commitment

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

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

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

4 ENVIRONMENT

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

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 Measurement of Outcome

4.3.1 Assessments, policy and goals

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

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

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

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

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

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

PI	KEY ERFORMANCE AREA	TARGET	TARGET DATE	2016 PERFORMANCE AGAINST TARGETS	STATUS
					•
	REPORTING	Annual public reporting against targets	DEC 2014	Our compliance against targets is reflected annually in the Sustainable Development and Integrated Reports	
	GHG	5% product GHG emission intensity reduction from base	SEPT 2016	44% intensity reductions in landbased facilities*	
131111	EMISSIONS (SCOPE 1 AND 2)	year (2013)	3271 2010	7% increase in emission intensity on vessels	
	AND 2)	Further 2.5% product GHG emission intensity reduction year-on-year from 2016 to 2018	SEPT 2017 - SEPT 2018	Within target timeframe range	•
		5% product energy intensity reduction from base year (2013)	SEPT 2016	20% increase in pruduct energy intensity (landbased facilities and vessels)*	•
(a)	ENERGY	Further 2.5% product energy intensity reduction year-on-year	SEPT 2017 - SEPT 2018	Within target timeframe range	
© S S S S S S S S S S S S S S S S S S S	ENERGY	5% electricity per unit area intensity reduction from base year (2013) by Oceana Group Corporate Office	SEPT 2016	12% decrease in electricity per unit area	
		Further 2.5% electricity per unit area intensity reduction year-on-year by Oceana Group Corporate Office	SEPT 2017 - SEPT 2018	Within target timeframe range	
6 manne V	WATER USAGE	2.5% product water usage intensity reduction from base year (2013)	SEPT 2016	4% decrease in the product water intensity from 2013*	
8	AND DISPOSAL	Measurement and reporting of quantity and quality of effluent	SEPT 2017	The target date was amended to allow for the additional effluent monitoring which would be required with the advent of the Coastal Water Discharge Permits	
15 II	WASTE	Ensure that no food that is fit to eat (by humans or animals) is sent to landfills	ANNUAL	Compliance against our targets is	
∞	DISPOSAL	Measurement and reporting of quantity and type of waste	SEPT 2015	reflected annually in our Sustainable Development Report	

Monitoring, mitigation and managing our environmental impacts is a priority sustainable development practice, with the emphasis placed on promoting the efficient use of resources. Our reliance on renewable ecosystem services necessitates that we make a positive contribution to the sustainability of the fishing industry, which can be greatly influenced by unsustainable resource use practices. Our approach aims to contribute towards national development and policies.

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

This year we undertook a sense check to determine whether the environmental risk identified takes into account:

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

We considered the World Economic Forum – Global Risk Report (2015), the IRMSA South African Risk Report (2015) and the WWF SA Environmental Risks report (2014).

OGL's top 10 environmental risks encompass the environmental risks detailed in the WWF and WEF reports. Other than water access, no environmental risks were noted in the top 10 IRMSA report (SA specific, related to economic, social and SA governance risks).

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

Oceana partnered and funded initiatives in association with the Responsible Fishing Alliance ("RFA") and the World Wildlife Fund ("WWF"). The RFA provides a platform for collaborative research and mitigation efforts. Highlights in 2016 include: alerting government to the dangers

of bulk sediment mining; a socio-economic assessment of the fishing industry; and initiatives to prevent accidental seabird mortalities on hake vessels. To promote the sustainable use of fish resources we have continued our engagements with industry stakeholders and continue to partner with government and others to promote an ecosystems approach to fishing (EAF).

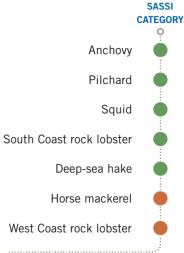
Since 2011 we have trained almost 300 seafaring employees, accounting for 53% of all applicable employees on responsible fishing practises and EAF. Cumulatively, 1 400 seafaring employees of the RFA member entities have been trained to date. Oceana is considered the industry leader in terms of the number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

Oceana is an active member of this partnership. The partnership has been responsible for the improved management of twelve non-target fish species that are caught alongside hake in the deep-sea trawl fishery. SADSTIA and WWF-SA have agreed to work together to implement a three-year South African offshore trawl by-catch fishery conservation project (FCP).

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

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

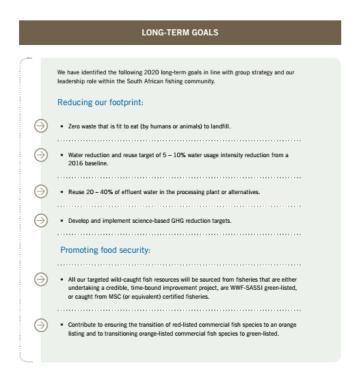
SOUTH AFRICAN COMMERCIAL FISHING RIGHT



4.4 Continual Improvement Commitment

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

In addition, we've established long-term goals geared to reducing our ecological footprint and promoting food security.



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

The year 2017 will also see us detail the climate change strategy, including the development of science based targets.

5 ANTI-CORRUPTION

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

5.1 Global Compact Principles

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
- o GRI 4

5.3 Measurement of Outcome

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

Directors and employees are required to observe the highest ethical standards in conducting the group's business. In this regard, the group has a formal code of business conduct and ethics. An anonymous and secure whistle-blowing facility has been in place for many years. Its purpose and anonymity are emphasised at employee induction and training sessions. The facility is also available in Namibia. In the current reporting period, as at end August 2016 a total of 9 calls were received, of which 5 were wrong numbers; 2 were queries regarding the purpose of the line; and 2 were unrelated to Oceana.

5.3.1 Assessments, policy and goals

Oceana is committed to building trusted relationship with all key stakeholders. The board and management are responsible for ensuring the sustainability of the business by having a clear strategy in place and demonstrating a visible commitment to ethical behaviour and good corporate governance 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 is 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 Antibribery and Corruption is one of the training modules. Directors and employees are required to observe the highest ethical standards in conducting the group's business. In this regard, the group has a formal Code of Business Conduct and Ethics. 49 new employees completed training on the code of conduct and another 32 new employees are currently in training.

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

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

In the current reporting period, as at end August 2016 a total of 9 calls were received, of which 5 were wrong numbers; 2 were queries regarding the purpose of the line; and 2 were unrelated to Oceana.

5.3.2 Continual Improvement Commitment

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

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

17 December 2016