



FISHERIES COMPLIANCE POLICY

Table of Contents

| | | |
|----|---------------------------------|---|
| 1. | Background | 2 |
| 2. | Policy Statement | 2 |
| 3. | Policy Application | 2 |
| 4. | Compliance Outcomes | 2 |
| 5. | Policy Detail | 2 |
| 6. | Compliance Obligations..... | 3 |
| 7. | Functions and Delegations | 3 |
| 8. | Signed:..... | 4 |

1. Background

If Sanford's vision of being the "best seafood company in the world" is to be achieved while maintaining its commitment to sustainable seafood legal compliance at all levels, including fisheries law, is fundamental. Failure to understand and act within required legal constraints may result in a number of negative consequences including not only reputational damage but risk to key company assets.

2. Policy Statement

Sanford Limited is committed to and conducts all aspects of its business lawfully and in a manner that ensures compliance with all applicable fisheries laws including the Fisheries Act 1996, all Fisheries regulations, all codes of practice and approved polices (**Fisheries Laws**).

Sanford Limited will carry out all aspects of its business activities in a way that maximises business opportunities while ensuring Sanford's policy as detailed in the first paragraph immediately above is observed at all times.

3. Policy Application

This policy shall apply to all persons working for or fishing to Sanford, including:

- Sanford staff;
- Independent contractors including share fishers, Joint Ventures and ACE fishers whether fishing in New Zealand's exclusive economic zone or in the high seas, any other exclusive economic zone or sovereign waters (when other laws / rules / conditions may also apply).

4. Compliance Outcomes

Risks arising from Fisheries Laws are minimised through a proactive culture of compliance.

Sanford Limited has appropriate, informed systems in place to ensure all staff and contractors are adequately informed, trained and supported in compliance with Fisheries Laws.

5. Policy Detail

Sanford Limited:

- complies with all relevant Fisheries Laws;
- maintains and raises the level of awareness and understanding that ensures and optimises compliance with Fisheries Laws within the company through the provision of education, training and legal advice;
- develops and applies practices, processes and policies to ensure compliance with Fisheries Laws;

- has a training and induction programme suitable to various levels of staff to ensure understanding of Fisheries Laws relevant to the role;
- monitors compliance with Fisheries Laws;
- reviews and investigates incidents and takes appropriate action to prevent recurrence of any failure to comply with Fisheries Laws.

6. Compliance Obligations

Sanford Limited manages compliance with Fisheries Law through:

- identification, development and documentation of relevant procedures and processes necessary to ensure compliance with Fisheries Laws and to manage non-compliance;
- systematically improving procedures and processes for compliance with Fisheries Laws;
- monitoring, documenting and reporting of non-compliance with Fisheries Laws;
- taking legal advice as required to proactively ensure awareness of Fisheries Laws and ongoing review and implementation of appropriate steps and policies to ensure compliance.

7. Functions and Delegations

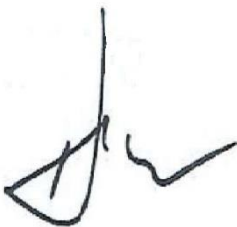
| Position | Delegation/Task |
|---|--|
| Board of Directors | <ul style="list-style-type: none"> • Endorse Fisheries Compliance Policy; • Compliance with Fisheries Compliance Policy; • Outline clear expectations re compliance with Fisheries Laws; • Ensure management understands and operates in a way that recognises and implements Fisheries Compliance Policy. |
| Health & Safety and Regulatory Compliance Committee | <ul style="list-style-type: none"> • Review and oversee Sanford's Fisheries Laws compliance; • Review and make recommendations to the Board on breach of key compliance requirements; • Review investigations and make appropriate recommendations to the Board on Fisheries Laws compliance. |
| CEO | <ul style="list-style-type: none"> • Ensure implementation of Fisheries Compliance Policy; • Report to Board on a regular basis re Fisheries Laws compliance. |
| Management | <ul style="list-style-type: none"> • Compliance with Fisheries Compliance Policy; • Promotion of Fisheries Compliance Policy within the company and ensuring awareness, training and understanding; • Management and monitoring of Fisheries Laws compliance; |

Vessel Masters & Supervisors

Sanford Workers

- Allocate resources and training to ensure compliance with Fisheries Laws;
- Ensure appropriate investigations, actions and recommendations re non-compliance.
- Ensure awareness and understanding of Fisheries Laws;
- Take pro-active steps to ensure adequate understanding and training of Fisheries Laws;
- Report on non-compliance.
- Ensure awareness and understanding of Fisheries Compliance Policy and Fisheries Laws;
- Adopt appropriate compliance practices;
- Report non-compliance;
- Encourage compliance by others.

8. Signed:



Rob McLeod
Chairman H&S and Regulatory Compliance Committee



V Kuntzsch
Chief Executive Officer

Reviewed: March 2017

Next Review Due: