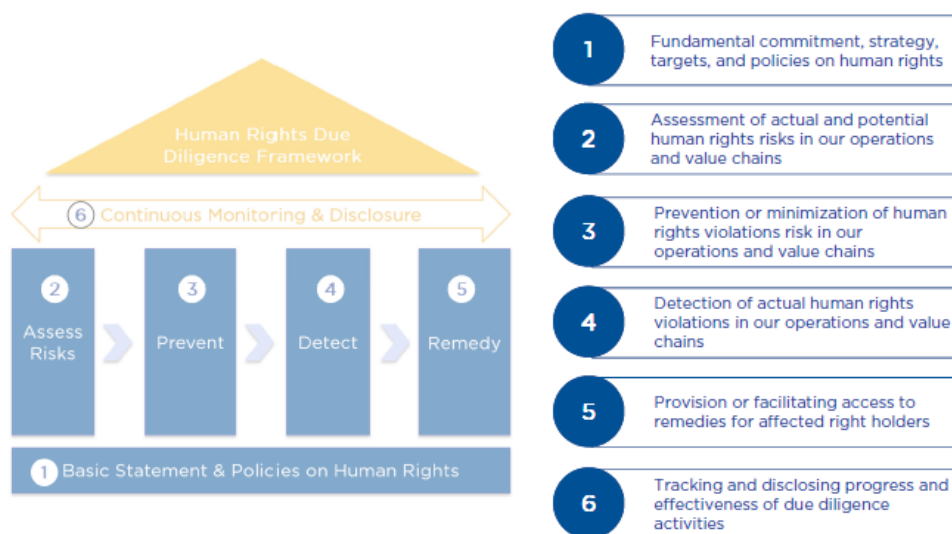


Thai Union’s Human Rights Risk Assessment

Assessment of potential human rights risk is one of the key pillars of Thai Union’s [Human Rights Due Diligence Framework](#) (“Pillar 2 – Assess Risk”). We use findings from previous risk assessment exercises to inform our key activities, policies, and measures to prevent or minimize human rights risk, detect cases of human rights harms, and facilitate access to remedies for affected rights holders, in both our operations and supply chain. These various efforts are explained in our [SeaChange® Sustainability Website](#), Annual Sustainability Report, as well as [the UK Modern Slavery Act Statement](#).

Component of the Framework – Brief Description of Six Pillars



Previous and Current Efforts in Human Rights Risk Assessment

In 2015, we conducted human rights risk assessment for [fisheries supply chain](#) and separately a global consultation with stakeholders to discuss sustainability risks including human rights risks.

In 2016, we conducted human right risk assessment for [packaging, food ingredient, and shrimp supply chain in Thailand](#). In addition, we conducted social dialogue-based audits of labor supply chain in Thai Union’s factories, in partnership with and NGO Migrant Worker Rights Network (MWRN). In particular, the labor supply chain assessment found high risk of abuse and extortion by job recruitment agencies.

Currently, in 2018 we have begun to conduct a desk-based research on human rights risk at a [country level](#) for countries where we operate and source from, focusing on the issues of labor trafficking, forced labor, and child labor. The purpose is help us get more granular understanding of the risks and compare risks across the countries in order to prioritize our efforts.



Going forward, we will continue to further refine risk assessment findings by considering: (i) wider scope of human rights risks (beyond labor trafficking, forced labor, and child labor) and (ii) fieldwork and consultation with stakeholders, prioritizing on parts of operations and supply chains that have been identified as high priority from previous risk assessment exercises.

Human Rights Risk Assessment Methodologies & Results

The human right risks assessments conducted in 2015-2016 were based on a combination of risk analysis methods as "Supply chain mapping" and "Activity-based risk analysis through audits and social dialogue". Based on these exercises, we have identified eight following salient human rights risks in both our operations and value chains:

- Forced labor or modern slavery
- Indebted or bonded labor arising from excessive recruitment fees
- Lack of freedom of association or lack of worker voice
- Child labor
- Excessive overtime
- Unsafe and unhealthy working condition
- Community health & safety in the event of major accidents in production plants
- Consumer health & Safety

As mentioned in the previous section, in 2018 Thai Union began to conduct a country-level human rights risk assessment with focuses on the issues of labor trafficking, forced labor, and child labor. These three issues are closely linked to the salient human rights risks identified above.

In particular, we conducted the assessment for the 15 countries that have at least one Thai Union's own production facilities. These cover activities by Thai Union's own subsidiaries, associated companies, and joint ventures with Thai Union's management controls. Separately, the assessments were conducted for the 16 countries where our tier-one suppliers operate.

Both sets of assessments rely on key indicators found in three public reports pertaining to labor trafficking, forced labor, and child labor. These are: [US Trafficking in Persons \(TIPs\) Report 2017](#), [the 2016 Global Slavery Index](#) by the Walk Free Foundation and International Labour Organization (ILO), and the [US Department of Labor's reports on Child Labor and Forced Labor](#). First, we rank the countries for each indicator of labor trafficking, forced labor, and child labor found in these public sources. It should be noted that individual country ranking is not always aligned across the three data sources due to their different methodologies and focuses. Secondly, we compute a simple average ranking from all the indicators considered. We then group the countries into three categories or risk – high-priority, medium-priority, low-priority – based on average ranking. "High Priority" Group represents average higher risk than the "Medium Priority" and "Low Priority" Groups. The results of risk ranking for the 15 countries where we operate and for the 16 countries where our tier-one suppliers operate are presented in the table below.

Priority Grouping

For the 15 countries where we operate, we assign 6 countries at the bottom of the ranked list (i.e. lowest average ranking) to the 'High Priority' Group. The top four countries in the ranked



list are assigned to the 'Low Priority' Group. The rest of the countries in the middle of the list is assigned to 'Medium Priority' Group.

In similar vein, for the 16 countries where our tier-one suppliers operate, we choose four countries at the bottom of the ranking list (i.e. lowest average ranking) and assign them to the 'High Priority' Group. The top four countries of the ranking list are assigned to the 'Low Priority' Group. The rest of the countries in the middle of the list is assigned to 'Medium Priority' Group.



Risk Assessment for Our Operations

See details in Annex 1 – List of Operations Assessed (Own Company, Subsidiary, Joint Ventures, Associate)

High Priority	Medium Priority	Low priority
Thailand	Lithuania	Canada
Vietnam	UK	Germany
Ghana	USA	Norway
Seychelles	France	Portugal
United Arab Emirates	Poland	
India		

Risk assessment for our Tier-I suppliers

High Priority	Medium Priority	Low priority
Bangladesh	Panama	Canada
China	Vietnam	Chile
India	Argentina	Norway
Thailand	Sri Lanka	USA
	Nicaragua	
	Ecuador	
	Indonesia	
	Peru	

Going forward, we will continue to further refine risk assessment findings by considering: (i) wider scope of human rights risks (beyond labor trafficking, forced labor, and child labor) and (ii) fieldwork and consultation with stakeholders, prioritizing on parts of operations and supply chains that have been identified as “high-Priority” above. We will then use the updated risk assessment findings to inform our future activities to prevent, detect, and remedy human rights violations at a country or sector-level, based on our Human Rights Due Diligence Framework.

Risk Mitigations

Risk	Implication	Mitigations
High	Operation and value chain having risk to violate or abuse the human rights at individual level or towards vulnerable groups (Legal Complicity).	<ul style="list-style-type: none"> • Refer to mitigations in Thai Union Modern Slavery Act Statement http://www.thaiunion.com/files/download/sustainability/policy/TU-modern-slavery-2017-en.pdf • Policies on Modern Slavery, Human Trafficking and Human Rights. • Social compliance program <ul style="list-style-type: none"> • Sign the Business Ethics and Labor Code of Conduct; • Internal and external supplier audits to ensure adherence to the Code of Conduct, course-correcting or terminating relationships, if necessary. • Capacity building program, train suppliers who wish to comply with the Code of Conduct but are currently unable to meet its commitments • Staff training package; train all existing, new employees and migrant workers on the Business Ethics and Labor Code of Conduct; • Provide real-time several grievance and whistleblowing channels
Medium	Operations which do not violate human rights, but benefits from those committed by others (Non-legal Complicity). The business is unable to restore or remediate human rights related concerns raised by internal or external groups.	<ul style="list-style-type: none"> • Policies on Modern Slavery, Human Trafficking and Human Rights. • Sign the Business Ethics and Labor Code of Conduct. • Capacity building program, train suppliers who wish to comply with the Code of Conduct but are currently unable to meet its commitments • Staff training package; train all existing, new employees and migrant workers on the Business Ethics and Labor Code of Conduct. • Provide real-time several grievance and whistleblowing channels.
Low	Operational level and existing grievance	<ul style="list-style-type: none"> • Policies on Modern Slavery, Human Trafficking and Human Rights. • Sign the Business Ethics and Labor Code of Conduct.

Risk	Implication	Mitigations
	mechanism can successfully remediate the human rights related concerns raised by internal or external groups.	<ul style="list-style-type: none"> Staff training package; train all existing, new employees and migrant workers on the Business Ethics and Labor Code of Conduct.

Annex 1 - List of Operations Assessed (Own Company, Subsidiary, Joint Ventures, Associate)

Company Name	Type	Product	Country	Category (Company, Subsidiary, JV, Associate)
THAI UNION MANUFACTURING CO., LTD.	Manufacturer and exporter of canned tuna and pet food	Canned Tuna and Pet food	Thailand	Subsidiary
SONGKLA CANNING PCL.	Manufacturer and exporter of canned seafood	Canned Seafood	Thailand	Subsidiary
T-HOLDING CO., LTD.	Distributor of food products under "Fishe", "SEAELECT", "Bellotta" and "Marvo" brand	Pet food, snack	Thailand	Subsidiary
THAI UNION FEEDMILL CO., LTD.	Manufacturer and distributor of animal feeds	Animal Feed	Thailand	Subsidiary
THAI UNION SEAFOOD CO., LTD.	Manufacturer and exporter of frozen shrimp	Frozen Shrimp	Thailand	Subsidiary
PAKFOOD PUBLIC CO., LTD.	Manufacturer and distributor of frozen food and aquatic animal	Frozen Food and Aquatic Animal	Thailand	Subsidiary
ASIAN-PACIFIC CAN CO., LTD.	Manufacturer and distributor of steel and aluminum food packaging products	Steel and Aluminium food packaging	Thailand	Subsidiary

Company Name	Type	Product	Country	Category (Company, Subsidiary, JV, Associate)
THAI UNION GRAPHIC CO., LTD.	One-stop-service offset printing house specialized in standard high-quality printouts	Printing service	Thailand	Subsidiary
THAI UNION ONLINE SHOP CO., LTD	E-commerce	E-commerce Service	Thailand	Subsidiary
YUEH CHYANG CANNED FOOD CO., LTD.	Manufacturer and distributor of canned seafood	Canned Seafood	Vietnam	Subsidiary
SEAFOOD INTERNATIONAL ONE FZCO	Distributor of food products	Food products	United Arab Emirates	Subsidiary
THAI UNION CHINA COMPANY LIMITED	Distributor of food products	Food products	China	Subsidiary
THAI UNION ASIA INVESTMENT HOLDING LIMITED	Holding Company	Not applicable	Hong Kong	Subsidiary
THAI UNION NORTH AMERICA, INC.	Holding Company	Not applicable	USA	Subsidiary
TRI-UNION SEAFOODS, LLC.	Manufacturer and distributor of canned seafood under “Chicken of the Sea” brand	Canned Seafood	USA	Subsidiary
TRI-UNION FROZEN PRODUCTS, INC.	Importer and distributor of frozen seafood	Frozen Seafood	USA	Subsidiary
U.S. PET NUTRITION LLC.	Manufacturer and distributor of premium pet food	Pet food	USA	Subsidiary
THAI UNION INVESTMENTS NORTH AMERICA LLC	Holding Company	Not applicable	USA	Subsidiary
THAI UNION EU SEAFOOD 1 S.A.	Holding Company	Not applicable	Luxembourg	Subsidiary
THAI UNION EUROPE	Holding Company	Not applicable	France	Subsidiary
EUROPEAN SEAFOOD INVESTMENT PORTUGAL	Manufacturer and exporter of canned sardines and mackerel	Canned Sardines and Mackerel	Portugal	Subsidiary

Company Name	Type	Product	Country	Category (Company, Subsidiary, JV, Associate)
MAREBLU SRL	Importer and distributor of canned seafood	Canned Seafood	Italy	Subsidiary
INDIAN OCEAN TUNA LIMITED	Manufacturer and exporter of canned tuna	Canned Tuna	Seychelles	Subsidiary
ETABLISSEMENTS PAUL PAULET SAS	Manufacturer, importer distributor and exporter of canned seafood	Canned Seafood	France	Subsidiary
PIONEER FOOD CANNERY LIMITED	Manufacturer of canned tuna	Canned Tuna	Ghana	Subsidiary
TTV LIMITED	Fishing fleet operation (Cease operation in 2017)	Fishery	Ghana	Subsidiary
JOHN WEST FOOD LIMITED	Importer and distributor of canned seafood	Canned Seafood	UK	Subsidiary
MERALLIANCE SAS	Distributor of smoked salmon	Smoked salmon	France	Subsidiary
MERALLIANCE ARMORIC SAS	Manufacturer of smoked salmon	Smoked salmon	France	Subsidiary
MERALLIANCE POLAND	Manufacturer of smoked salmon	Smoked salmon	Poland	Subsidiary
EDINBURGH SALMON COMPANY (ESCO)	Manufacturer and distributor of smoked salmon	Smoked salmon	UK	Subsidiary
KING OSCAR AS	Manufacturer and distributor of canned seafood	Canned Seafood	Norway	Subsidiary
THAI UNION POLAND SP Z.O.O.	Manufacturer and distributor of canned seafood	Canned Seafood	Poland	Subsidiary
RUGEN FISCH AG	Manufacturer and distributor of canned seafood	Canned Seafood	Germany	Subsidiary
HAWESTA-FEINKOST HANS WESTPHAL GMBH & CO. KG	Manufacturer and distributor of seafood	Seafood	Germany	Subsidiary

Company Name	Type	Product	Country	Category (Company, Subsidiary, JV, Associate)
THAI UNION TRADING EUROPE B.V.	Distributor of seafood products	Seafood	Netherlands	Subsidiary
THAI UNION CANADA	Processor and distributor of lobster	Lobster	Canada	Subsidiary
LUCKY UNION FOODS CO., LTD.	Manufacturer and exporter of crab sticks	Crab sticks	Thailand	Associated Company
BIZ DIMENSION CO., LTD.	Electronic Procurement Service Provider	Electronic Procurement service	Thailand	Associated Company
AVANTI FEEDS LTD.	Manufacturer and exporter of animal feeds and shrimp products	Animal Feed and Shrimp	India	Associated Company
AVANTI FROZEN FOOD PRIVATE LIMITED	Manufacturer and exporter of shrimp products	Shrimp	India	Associated Company
TN FINE CHEMICALS CO., LTD.	Manufacturer and exporter of by-products from seafood	Seafood byproducts	Thailand	Associated Company
SEAFOOD INTERNATIONAL TWO FZCO	Distributors of food products	Food products	United Arab Emirates	Associated Company
LDH (LA DORIA) LIMITED	Distributor of food products	Food	UK	Associated Company
RED LOBSTER GROUP	Holding Company	Not applicable	USA	Associated Company
MORESBY INTERNATIONAL HOLDINGS, INC. (MIH)	Holding Company in Fishing Business	Not applicable	British Virgin Islands	Joint Venture
TMAC CO., LTD.	Distributor of shrimp feed	Shrimp feed	Thailand	Joint Venture
THAI UNION HATCHERY CO., LTD.	Breeding and distributing postlarvae shrimp and nauplii	Shrimp farming	Thailand	Joint Venture
TCM FISHERY CO., LTD.	Shrimp Farm	Shrimp Farming	Thailand	Joint Venture
TMK FARM CO., LTD.	Shrimp Farm	Shrimp farming	Thailand	Joint Venture
SEAFOOD INTERNATIONAL HOLDCO	Holding Company	Not applicable	Cayman Islands	Joint Venture