

Greenpeace Asks – Response by Thai Union

GP Overarching asks to all companies

As with all of our corporate asks, we ask company's making commitments to specific objectives to:

- 1. Provide clear and transparent action plans, with dated milestones and benchmarks so that progress towards objectives can be clearly monitored, such as in public sourcing policies and annual reports.**

Sea Change is Thai Union's sustainability strategy and is designed to deliver real and lasting changes in the way that we operate and in the wider global and Thai fishing industries. Sea Change will address some of the most pressing needs in industry

Our overarching objectives

- The **seas are sustainable** now and for future generations, through our work to improve fisheries;
- Our **workers are safe, legally employed and empowered**;
- The **vessels we buy from are legal and operate responsibly**.

Four areas of focus

- Safe & legal labor;
- Marine conservation;
- Responsible sourcing;
- Caring for our communities

Each focus area has goals and a roadmap from now until 2020. All information is available on our website at www.seachangesustainability.org and reported annually through our Sustainability Report. The goals and roadmap are currently open to a global consultation, as a demonstration of transparency and inclusivity, and comments will be taken into account and included in the revised plans due in September 2016.

- 2. Deliver a fully traceable, third-party verified, chain of custody from ship to point of sale (including vessels, traders, wholesalers, canneries, and processors). Ensure that the names and addresses of all entities that handled a product can be identified.**

Through our marine conservation focus in Sea Change we have developed **global tuna sustainability goals and a roadmap**. The objectives of the global tuna sustainability plan are:



- Our tuna will be responsibly sourced from fisheries certified by the Marine Stewardship Council (MSC) or those engaged in a Fishery Improvement Project (FIP) or conservation project designed to bring them towards MSC standards;
- We will have full traceability across all of our global tuna supply chains - from catch to consumption.

We will be working closely with a number of partners and experts in fisheries management who will help us develop and implement our initiatives and achieve our 2020 goals

These parties include the International Seafood Sustainability Foundation (ISSF), the Marine Stewardship Council, the International Union for Conservation of Nature (IUCN), Fair Trade USA, USAID-Oceans and Fisheries Partnership, International Pole and Line Foundation (IPNLF), and World Wide Fund for Nature (WWF). We are committed to working with all Regional Fisheries Management Organizations (RFMOs). As a founding member of the ISSF we submit quarterly purchasing reports for tunas to the organization, and conduct an annual 3rd party audit. The 2015 audit is available upon request, and in 2016 the results will be made available publicly through our website.

While Thai Union currently has full traceability for tuna purchases, we are moving towards full digital traceability. This will provide a full digital chain of custody from vessel to final product on shelves, expanding the public facing can-tracker for all major tuna brands. A can tracker is currently available for our subsidiaries, John West, Petit Navire and Mareblu. Additionally Chicken of the Sea in the US provides a can tracker at <http://chickenofthesea.com/trace>.

3. At the point of sale, provide clear, accurate information to customers on labels and online.

We have 100% traceability for all tuna brands and will be developing a digital platform to capture the entire supply chain from catch to consumption, with a public facing can-tracker for all of our major tuna brands.

This is a company wide commitment fully supported by our subsidiaries; for example, John West have their own can tracker publically available at: www.john-west.co.uk/discover-the-story-behind-your-can. This is also true for Petit Navire in France (<http://petitnavire.fr/codepeche>), Mareblu in Italy



(<https://mareblu.it/scoprimi>) and Chicken of the Sea in the US (<http://chickenofthesea.com/trace>).

Petit Navire also has developed a website called Questions de Confiance (matter of trust) (<http://questionsdeconfiance.fr/>), where consumers can find responses frequently asked questions about sustainable fishing and can ask additional questions they have in this area.

4. Accept the responsibility to prevent or mitigate adverse human rights impacts that are directly linked to their operations.

Thai Union has led the industry by adopting policies and actions to mitigate human rights impacts directly linked to our operations.

In September 2015 the company introduced a revised and more stringent Business Ethics and Labor Code of Conduct, based on compliance with the applicable labor laws and conventions of the International Labor Organization. It applies throughout Thai Union and is being extended to cover all suppliers in our global supply chain. To achieve the highest level of transparency and reach, the Code has been translated into 19 languages.

The Code focuses on the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. Further details including the Code and its translations can be found at

<http://www.thaiunion.com/en/sustainability/sustainability-at-thai-union/code-of-conduct>

Since January 2015, the company has stopped purchasing from 17 suppliers that were suspected of using forced or illegal labor, as part of our commitment to eliminate human rights and labor abuses from our supply chain. We have reduced the number of vessels we purchase from in Thailand to around 400 from 2,000 to ensure we are purchasing legally caught fish and the workers in our supply chain are better protected.

In April 2016 we released our Ethical Migrant Worker Recruitment Policy (available [here](#)) developed in collaboration with local NGOs. This policy sets the standard for Thai industries, and in June 2016, the Minister for Labor in



Thailand visited a Thai Union factory to better understand how the policy has been implemented so that lessons can be shared.

We are members of the UN Global Compact, and work to uphold the principles of human rights and labor standards. We have been recognized for our work on sustainability, including human rights, through our inclusion in the Dow Jones Sustainability Index (DJSI).

Thai Union has initiated a long-term labor empowerment program to ensure that migrant employees in Thai Union facilities across Thailand receive formal training on applicable Thai labor and social welfare regulations and to promote adherence to these standards. Our goal is for our workers to gain information and support so that they can be empowered through knowledge and communication mechanisms. Throughout 2016, Thai Union is working with Migrant Worker Rights Network (MWRN) on a program of social auditing and development of social dialogue.

Thai Union has been working with the Issara Institute since 2014 to improve the conditions for workers in Thailand. In 2015 we worked with the Issara Institute to connect workers with their independent worker hotline, provided in five languages, in four factories and one port. In 2016, Thai Union is rolling this program out across all of our factories and ports used in Thailand. For further information see www.projectissara.org/.

Environmental asks

All fishing operations:

- 1. Fish legally and refuse to source from any vessels that have been blacklisted for engaging in IUU fishing. Greenpeace maintains a blacklist which includes, but is not limited to, all vessels blacklisted by RFMOs, and recommends that market players regularly consult this tool and other international blacklists before they agree to source from an operator and then consult these resources monthly.**

Knowing our suppliers and ensuring that we are purchasing from responsible organizations and well-managed vessels is critical to helping us achieve our objectives. Through a comprehensive range of initiatives Thai Union seeks to reduce the risks and/or the likelihood of illegal, unreported and unregulated (IUU) fishing entering its supply chain. These include improvements in fishing and sourcing practices, detailed catch documentation, improving traceability strategies, partnering with NGOs and governments on fishery improvement projects, and implementing a

responsible sourcing [Code of Conduct](#) suppliers must follow. We check regularly the IUU blacklist of regional fishery management organization (RFMO) and Thai Union is already committed to 100% trade sanctions against vessels excluded from the RFMO vessel list, or those in the IUU blacklist list. Note that small tuna fishing vessels under 24 meters in length operating exclusively within its national flag's EEZ are not required to register with the RFMO so many Indonesian, Maldives, Japanese are not listed.

- 2. Ensure all information related to the fishing operation required by the relevant regulatory bodies is reported in an accurate and timely manner.**

Thai Union and its subsidiaries around the globe follow all local laws and regulations required, including the provision of information required by these bodies (such as the time of importation or exportation of products at the Department of Fisheries or Customs) in an accurate and timely manner.

- 3. Do not source any stock that is overfished (biomass below BMSY), or species listed in one of the threatened categories (Vulnerable, Endangered, Critically Endangered) in the IUCN Redlist of Threatened or Endangered Species, or any other national or region list of Threatened and Protected species.**

Responsible sourcing is central to the successful implementation of our Sea Change strategy. The Responsible Sourcing roadmap covers all the species and major categories we procure, and consolidates our work on fishery improvement projects, traceability and labor practices that support other sustainability objectives. This roadmap allows us engage with fisheries we source from and with fishery stakeholders, to improve sustainability and social issues whilst utilizing private sector leverage. To abandon a fishery that does not meet bMSY will not help coastal communities, and leaves little opportunity to improve it for the better.

We follow all resolutions of the regional fisheries management organisations (RFMOs) we purchase from, and operate under those resolutions related to stocks that might be overfished. For example, we are currently working with the Indian Ocean Tuna Commission (IOTC) and other partners to address issues of vulnerability in yellow fin stocks through establishing a fishery improvement project and encouraging the implementation of harvest control rules. We do not source from endangered species as listed on the IUCN



Redlist, such as southern Bluefin (critically endangered) or Atlantic Bluefin (endangered).

Our global tuna supply chain is audited annually by an independent third party through the International Seafood Sustainability Foundation (ISSF). The ISSF Participating Company Compliance Audit Checklist details our compliance with all ISSF Conservation Measures and Commitments, covering compliance with standards on IUU fishing, traceability, shark finning, transshipment, skipper training on best practice, and independent observer coverage.

Furthermore, Thai Union Group has been certified as dolphin safe for at least the last 20 years. All companies and subsidiaries who have signed a dolphin safe agreement are subject to regular monitoring by the Dolphin Safe Program under the Earth Island Institute International Monitoring Program (IMP). This is the only independent marine conservation monitoring effort in the world. Monitoring includes port monitoring; onboard monitoring and cannery monitoring.

Thai Union condemns the practice of shark finning and prohibits the practice onboard its vessels and those of its subsidiaries. Thai Union will not conduct business with any vessel that has been identified by an Regional Fisheries Management Organization (RFMO) or national authority to have shark finning practices. Our policy can be found at http://www.thaiunion.com/files/download/sustainability/policy/POLICY_REGARDING_SHARK_FINNING.pdf

- 4. Do not fish, source or trade any tuna caught in any protected area, including the PNA closed high seas areas for purse seine and the Pacific Commons for all gear types.**

We do not fish, source or trade in tuna caught in protected areas.

Purse seine operations:

By a mutually agreed deadline only source from purse seine operations that meet the following criteria:

- 1. Only operate or source from vessels where 100% independent human observer catch monitoring is in place.**

All purse seine suppliers, which make up over 80% our tuna purchases, are required to be on the ISSF Proactive Vessel Registry (PVR), a critical initiative to promote responsible and sustainable tuna fisheries, which provides third party validation of active fishing registration and non-IUU fishing practices. We encourage our suppliers to partner with us by joining the PVR, and from the 1st January 2016, all of the large-scale purse seiners that we source from that catch yellowfin, bigeye, and skipjack tuna are registered on the PVR. All large scale purse seiners on the PVR list have to have an observer on board, either human or electronic or both.

For small scale purse seiners, long-liners and pole and line vessels, we have a strict policy to request EU Catch Certificates or equivalent documentation if not exporting to the EU. If the vessel does not wish to provide the data as in the catch certificate, we require for the flag country vessel registration; Regional Fishery Management Organization (RFMO) registration and fishing license.

We also encourage the use of the Unique Vessel Identifier (UVI) in tuna fisheries when an IMO is not available due to the size of the boat, and have refused transactions from purse seine vessels that have failed to secure a UVI since 2011.

In Thailand, since March 2015, all vessels above 30GT must install Vessel Monitoring Systems (VMS) which improves the real time tracking of boats. The Royal Thai Government Department of Fisheries is charged with managing the VMS program, as part of their work to tackle IUU fishing for purse seine and other vessels.

2. Transshipment's can only take place in designated ports, in compliance with all relevant RFMO and national regulations.

In April 2015 Thai Union published its transshipment policy ceasing all purchases from motherships and transshipment vehicles in Thailand, and in compliance with new Fisheries Management policies. As previously stated we are committed to following the ISSF and RFMO resolutions as well as relevant national regulations. See [here](#).

3. Eliminate from your supply chain /end the use of FADs and any other associated sets within the next three years (i.e. by October 2018).

Thai Union currently complies with the ISSF policy and recommendations relating to the use of Fishing Aggregated Devices (FADs). This includes not covering FAD surfaces with mesh, using non-meshed materials and avoiding setting on small schools. We also support the ISSF ongoing FAD research into technical methods to reduce catch of small bigeye tuna and impacts to sharks and other finfish by purse seine vessels and currently trials are being carried out to use natural or biodegradable materials. We support ISSF ongoing FAD research into technical methods to reduce catch of small bigeye tuna and impacts to sharks and other finfish by purse seine vessels. Responsible sourcing is based on the stock status of species, impacts to ecosystems, and fishery management with sustainability outcomes such as MSC – not necessarily a specific fishing technique.

- 4. Do not retain any parts of any captured marine animal, while discarding the carcass at sea. This includes shark finning, removal of gill-rakes from rays, and any other similar practice on any other species. Any such species caught should be landed with all body parts naturally attached.**

Our global tuna supply chain is audited annually by an independent third party through the International Seafood Sustainability Foundation (ISSF) compliance with all ISSF Conservation Measures and Commitments. This includes audits for compliance with standards on IUU fishing, traceability, shark finning, transshipment, skipper training on best practice, and independent observer coverage.

Thai Union and its subsidiaries has been certified as dolphin safe for over 20 years. All companies and subsidiaries who have signed a dolphin safe agreement are subject to regular monitoring by the Dolphin Safe Program under the Earth Island Institute IMP. This is the only independent marine conservation monitoring effort in the world. Monitoring includes port monitoring; onboard monitoring and cannery monitoring.

Thai Union condemns the practice of shark finning and prohibits the practice onboard its vessels and those of its subsidiaries. Thai Union will not conduct business with any vessel that has been identified by a Regional Fisheries Management Organization (RFMO) or national authority to have shark finning practices. This ban continues for two years from the date of the most recent infringement identified by an RFMO.

5. Do not source from companies that practice or allow shark finning in any part of their supply chain.

Thai Union condemns the practice of shark finning and prohibits the practice onboard its vessels and those of its subsidiaries. Thai Union will not conduct business with any vessel that has been identified by an RFMO or national authority to have practiced shark finning.

6. Do not intentionally kill or land any critically endangered or endangered marine animals including sharks, rays, cetaceans and turtles, nor any other species for which targeting, retention and/or landing is prohibited, and report any accidental catches of such animals.

Our global tuna supply chain is audited annually by an independent third party through the International Seafood Sustainability Foundation (ISSF) compliance with all ISSF Conservation Measures and Commitments. This includes audits for compliance with standards on IUU fishing, traceability, shark finning, transshipment, skipper training on best practice, and independent observer coverage.

Thai Union and its subsidiaries has been certified as dolphin safe for over 20 years. All companies and subsidiaries who have signed a dolphin safe agreement are subject to regular monitoring by the Dolphin Safe Program under the Earth Island Institute IMP. This is the only independent marine conservation monitoring effort in the world. Monitoring includes port monitoring; onboard monitoring and cannery monitoring.

Thai Union condemns the practice of shark finning and prohibits the practice onboard its vessels and those of its subsidiaries. Thai Union will not conduct business with any vessel that has been identified by a Regional Fisheries Management Organization (RFMO) or national authority to have shark finning practices. This ban continues for two years from the date of the most recent infringement identified by an RFMO.

Our overarching objectives are to operate on par with the MSC standard or engage in fishery improvement project or conservation projects working towards MSC outcomes, which specifically address issues around Eastern Tropical Pacific (ETP) species.

7. Have procedures in place for the release alive of any captured endangered and vulnerable marine animals such as cetaceans, sharks, rays and turtles.

Thai Union follows the International Seafood Sustainability Foundation (ISSF) policies and recommendations regarding safe handling techniques for ETP species and bycatch in general. These techniques specifically address bycatch of sharks and rays, whale sharks and turtles. A report from ISSF detailing mitigation techniques for by catch can be found on this link: <http://bit.ly/25piG0q>

8. Obtain credible third party verified chain of custody certification for all purse seine operations and make this information available to the public.

All large scale purse seine suppliers, which make up over 80% of our tuna purchases, are required to be on the Proactive Vessel Registry, (PVR) which provides third party validation of active fishing registration and non-illegal, unregulated and unreported (IUU) fishing practices. We encourage our suppliers to partner with us by joining the PVR on large and small scale vessels. From January 1st 2016, all of the large-scale purse seiners that we source from that catch yellowfin, bigeye, skipjack and albacore tuna are registered on the PVR.

We are also subject to a number of customer audits carried out by International 3rd party companies such as SGS, MRAG and Intertek.

In Europe, Thai Union has embarked on the external audit of its fish suppliers. Third-party checks compliance with the IUU regulations, International Seafood Sustainability Foundation requirements, Thai Union's Business Ethics and Labor Code of Conduct and Thai Union Europe's Fish Sustainability Policy.

For small scale purse seiners, long-liners and pole and line vessels, we have a strict policy to request EU Catch Certificates. If the vessel does not wish to provide the Catch Certificate, we require for the flag country vessel registration; Regional Fisheries Management Organization registration or fishing license.

Long-line fishing operations:

By a mutually agreed deadline, only source from longline operations that meet the following criteria:

1. **Do not conduct any at sea transshipment, or source from vessels that have transshipped at sea.**
2. **Do not retain any parts of any captured marine animal, while discarding the carcass at sea. This includes shark finning, removal of gill-rakes from rays, and any other similar practice on any other species. Any such species caught should be landed with all body parts naturally attached.**
3. **Do not use, or source any tuna from vessels that use shark targeting methods including wire tracers, shark specific bait, or use harpoons and other methods to catch rays.**
4. **Do not source from companies that practice or allow shark finning in any part of their supply chain.**
5. **Do not intentionally kill or land any critically endangered or endangered marine animals including sharks, rays, cetaceans and turtles, nor any other species for which targeting, retention and/or landing is prohibited, and report any accidental catches of such animals.**
6. **Adopt circle hooks and other best practice mitigation for bycatch reduction for the region of operation.**
7. **Have procedures in place for the release alive of any captured endangered and vulnerable marine animals such as cetaceans, sharks, rays and turtles.**
8. **Only operate or source from vessels where 100% independent human or electronic catch monitoring is taking place (for longline this may need to begin with a small-scale pilot but the overall intention should be clear and a general timeline should be established).**
9. **Obtain third party verified chain of custody certification for all longline operations.**

For small scale purse seiners, long-liners and pole and line vessels, we have a strict policy to request EU Catch Certificates. If the vessel does not wish to provide the Catch Certificate, we require for the flag country vessel registration; Regional Fisheries Management Organization registration or fishing license.

Our policy is only to purchase albacore tuna caught by long-liners that land the fish in at the port or is transshipped at sea with an observer present and



when a transshipment declaration is provided. Thai Union also has a local representative visit the fish landing port and suppliers to inspect their operations.

Labor Asks

1. Provide clear and transparent action plans, with dated milestones and benchmarks so that progress towards objectives can be clearly monitored, such as in public sourcing policies and annual reports.

Thai Union has led the industry forward by adopting policies and actions designed to mitigate human rights impacts directly linked to our operations. Our clear and transparent action plans, with dated milestones and benchmarks, can be found at <http://seachangesustainability.org/about-seachange/safe-and-legal-labor/>. These actions plans are currently open to a global consultation, as a demonstration of transparency and inclusivity, and comments will be taken into account and included in the revised plans due in September 2016. In September 2015 the company introduced a new and more stringent Business Ethics and Labor Code of Conduct based on compliance with the applicable labor laws and conventions of the International Labor Organization. It applies throughout Thai Union and is extended to cover suppliers in our global supply chain. To achieve the highest level of transparency and reach, the code has been translated into 19 languages.

In March 2016 Thai Union invited over 600 fish and non-fish suppliers to an event focused on how to best comply with our Code of Conduct. The Code focuses on the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. Similarly to the 2013 Code of Conduct, there is a zero tolerance policy for human rights violations in the supply chain. Further details including the Code and its translations can be found at <http://www.thaiunion.com/en/sustainability/sustainability-at-thai-union/code-of-conduct>

As a result of the commitment to eliminate human rights and labor abuses from our supply chain, the company ceased purchasing from 17 suppliers that were suspected of using forced or illegal labor. We have also reduced the number of vessels from which we purchase in Thailand from 2,000 to



around 400 in order to ensure we are purchasing legally caught fish and to increase protection for workers in our supply chain.

In April 2016 we released our [Ethical Migrant Worker Recruitment Policy](#), developed in collaboration with local NGOs. This policy sets the standard for Thai industries, and in June 2016, the Minister for Labor in Thailand visited a Thai Union factory to better understand how the policy was implemented so lessons can be shared.

We are members of the UN Global Compact, and work to uphold the principles of Human Rights and Labor Standards. We have been recognized for our work on sustainability, including human rights, through our inclusion in the Dow Jones Sustainability Index.

Thai Union has initiated a long-term labor empowerment program to ensure that migrant employees in Thai Union facilities across Thailand receive formal training on applicable Thai labor and social welfare regulations and also to promote adherence to these standards.

The purpose of the program is provide workers with the information and support they need to be empowered through knowledge and communication mechanisms. Throughout 2016 Thai Union is working with the Migrant Workers Rights Network on a program of social auditing and development of social dialogue.

Thai Union has been working with the Issara Institute since 2014 to improve the conditions for workers in Thailand. In 2015 we collaborated to connect workers with their independent worker hotline, provided in five languages, in four factories and one port. In 2016 Thai Union is rolling this program out across all of our factories and ports used in Thailand. For further information see www.projectissara.org/

2. Deliver a fully traceable, third-party verified, chain of custody from ship to point of sale (including vessels, traders, wholesalers, canneries, and processors). Ensure that the names and addresses of all entities that handled a product can be identified.

We have delivered a fully traceable, third party verified, chain of custody from vessels with the shrimp feed supply chain. We plan to roll the lessons learned from this process to all Thai caught fish, and then other geographies.

3. At the point of sale, provide clear, accurate information to customers on labels and online.

We have 100% traceability for all tuna brands and we will be developing a digital platform to capture the entire supply chain from catch to consumption with a public facing can-tracker for all of our major tuna brands.

This is a companywide commitment fully supported by our subsidiaries; for example, John West have their own can tracker publically available at: www.john-west.co.uk/discover-the-story-behind-your-can. This is also true for Petit Navire in France (<http://petitnavire.fr/codepeche>), Mareblu in Italy (<https://mareblu.it/scoprimi>) and Chicken of the Sea in the US (<http://chickenofthesea.com/trace>).

Petit Navire has also developed a website called Questions de Confiance (matter of trust) (<http://questionsdeconfiance.fr/>), where consumers will find the responses to the frequently asked questions about sustainable fishing and can ask any question they may have in this area.

4. Refuse to source from any vessels that have been blacklisted for engaging in IUU fishing. Greenpeace maintains a blacklist which includes, but is not limited to, all vessels blacklisted by RFMOs, and recommends that market players regularly consult this tool and other international blacklists before they agree to source from an operator and then consult these resources monthly.

We do not purchase from IUU blacklists of Regional Fishery Management Organizations and DG Mare Europe.

5. Do not source from any vessels that transship (transfer their catches) at sea.

In April 2015 Thai Union published its transshipment policy ceasing all purchases from motherships and transshipment vehicles in Thailand, We are committed to following the ISSF and RFMO resolutions as well as relevant national regulations. See http://www.thaiunion.com/files/download/sustainability/policy/POLICY_THAI_UNION_TRANSSHIPMENT_Sept_2015.pdf

6. Only source from vessels, wholesalers, traders, canneries or processors and other relevant facilities and workplaces that can demonstrate through contracts, purchasing agreements, or other legally-binding documents that suppliers are:

a. Not actively impeding, sanctioning or disenfranchising workers from exercising any rights to freedom of association, fair representation, collective bargaining or forming or joining a trade union.

We support collective bargaining and or joining trade unions, under our commitments to the UN Global Compact. In Thailand we have worked with the Migrant Workers Rights Network/SERC Foundation to promote collective bargaining for our workers through the welfare committee process. We have bargaining agreements signed in several countries with several trade union organizations, for example in France with CGT and CFE-CGC or in Norway with LO.

b. Recruiting workers through formalized avenues (e.g. government regulated labour brokers or manning agencies where they exist) where workers:

i. understand the nature of the work (i.e. have given informed consent) and have received basic training where applicable (e.g. for work on fishing vessels);

ii. have read and signed a contract of employment that is written in a language that they understand and which does not include any clause stipulating that, where workers terminate their own employment with reasonable notice, the employer is able to apply financial penalties or transfer debts to members of the worker's family; are paid regularly in line with their contract of employment

iii. are working legally (e.g. migrant workers have been regularised), are either in possession of or not dispossessed of original copies of all documentation related to their employment (e.g. their own passport, government identification cards, work permits, employment contracts, Seaman Books) and are of legal working age.

We do not use third party brokers in Thailand and recruit directly through our own company which does not charge workers for any documentation.

We announced our Ethical Migrant Recruitment policy, which means workers coming to our Thai operations do not have to pay recruitment fees. All workers at Thai Union must be legally employed and we work with local NGOs to audit this process to ensure all workers have correct documentation and are paid in line with their contract of employment. This is audited by many standards, including BSCI, ETI Base Code and SEDEX as well as through MWRN and Issara Institute dialogue with workers.

c. Requiring that any costs incurred for recruiting workers be borne by the employer, not the worker.

See our Ethical Migrant Recruitment Policy.

d. Remunerating workers through fair and regular systems of payment that represent a local 'living wage' in accordance with the contractual agreement where:

- i. workers or their intended recipient (where an agreement is in place that remittance of funds is undertaken by a broker or manning agency) are directly receiving the wages due to them in line with their contract of employment.**

All workers are paid electronically to bank accounts with ATM cards and receive wages directly.

- ii. Workers and their intended recipients receive regular pay stubs that itemise and explain any deductions and wages are not subject to deductions for any goods or services that should be borne by the employer or recruiter (e.g. transport fees, documentation fees, equipment fees, accommodation fees, training fees, water or food) or extortionate levels of interest where goods or services are provided by the employer or recruiter (e.g. sundries, toiletries).**

All workers receive pay slips that itemize wages. Fees are not charged for transport, training, food, water etc. All food at canteens is subsidized and free rice is available as well as free recreation facilities and transportation from worker housing.

e. Operating under the regulatory frameworks of countries that:

- i. comply with, or are taking reasonable and demonstrable steps to bring national legislation into alignment with, key ILO conventions including: the Work in Fishing Convention 2007; the "Core Conventions" (C29, C87, C98, C100, C105, C111, C138, C182); and the Work in Fishing Convention 2007 (C188), whether or not the country is a party to these Conventions it is possible and legitimate for a country to have high standards that correspond to these Conventions.**

Our Business Ethics and Labor Code of Conduct is based on the conventions of the International Labor Organization (ILO), and we are founding members of the ILO Good Labor Practice program in Thailand.

Current ILO Conventions ratified by Thailand include:

1) Thailand has ratified 15 ILO Conventions, three of which are core conventions (C.100 on Equal Remuneration, C.138 on Minimum Age and C.182 on Worst Form of Child Labour). The latest ratification was on 11 October 2007, of C.159 Vocational Rehabilitation and Employment (Disabled Persons).

2) There are many Conventions that Thailand has not yet ratified which are both fundamental and could form governance instruments:

a. C087 – Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87);

b. C098 – Right to Organise and Collective Bargaining Convention, 1949 (No.98);

c. C111 – Discrimination (Employment and Occupation) Convention, 1958 (No.111).

ii. do not actively impede, sanction or disenfranchise workers in the seafood

sector from exercising any rights to freedom of association, fair representation or collective bargaining commensurate with those enjoyed by their compatriots working in other sectors or, in relation to migrant workers in the seafood sector, nationals of the country;

We do not.

iii. have taken or are taking reasonable and demonstrable steps to ensure that labour brokers supplying workers to the seafood sector are satisfactorily regulated.

We have eliminated the use of brokers in Thailand, and worked with local NGOs to go with workers to their home countries to ensure brokers supplying workers meet our recruitment policies. Additionally, Thai Union representatives have physically travelled with workers to better understand the process in order to facilitate safe and legal migration.

7. Ensure that regular, unannounced audits of vessels, canneries, processors and other relevant facilities and workplaces throughout the extended supply chain are an integrated part of efforts to monitor social compliance. The auditing process must:

a. ensure the involvement of workers as well as local trade unions, labour rights groups, relevant civil society or intergovernmental organisations that represent the interests of workers yes through social dialogue and work with MWRN and the Issara Institute. Civil society, intergovernmental and governmental organizations are all able to inspect our facilities and talk with workers.

- b. Be undertaken by a credible third party which is competent in conducting worker interviews and screening for indicators of trafficking, forced and bonded labour. For example, interviews should be:**
- i. anonymous, confidential and held in a secure location without the presence of any representative of the management, the employer or a government authority/agency; and are conducted with informed consent and an explanation of options available to the interviewee including their right not to be interviewed;**
 - ii. conducted in a language that the worker understands;**
 - iii. facilitated by an independent and trained interpreter.**
 - iv. include a broad, representative sample of workers not selected by vessel owners, crew leads or facility management Yes through social dialogue program with local NGOs, as well as supported by multiple social audits from customers to international standards.**
- c. Involve the collection of data (i.e. photographic, video documentation) that are open to scrutiny by trusted civil society stakeholders; This is a violation of privacy of workers, and cannot be complied with.**
- d. Ensure workers and their organisations have access to audit reports and remediation plans Workers tend not to have organisations, this point is unclear.**
- e. Be applicable to any vessel, cannery, processor and other relevant facility and workplace that acts as a sub-contractor to suppliers in the supply chain (e.g. unregulated pre-processing facilities). Worker contracts and pay slips are available for scrutiny if required.**

In order to comply with our customer requirements, our canneries go through external audits aimed at demonstrating compliance with labor standards based on the ETI or BSCI Code of Conduct or SEDEX/SMETA initiative. Some of those audits may be unannounced. Audits are conducted by accredited certification bodies who have to follow specific procedures, for example when conducting worker interviews.

For vessels we have started programs in Thailand and Europe for 3rd party audits of labor conditions.

8. Workers should have access to secure, anonymous, confidential and an independent mechanism for the registering of complaints when they believe their rights are being violated. A proper worker/employer grievance handling system must be in place at the level of the supplier, and a means must exist by which workers or their representatives can take a complaint up to the level of the buyer, if not solved by the supplier.

In Thailand third party independent grievance mechanisms are available for all workers through the Migrant Workers Rights Network, Issara Institute and the Labor Rights Promotion Network (LPN). All of these third party organisations are free to investigate issues raised, and work with Thai Union on resolutions if required. Through our project with the Issara Institute, our customers have full transparency of issues raised through the grievance mechanism.

In other facilities such as Seychelles, Ghana and European facilities workers have workers councils and/or unions and are totally free to provide anonymous complaints either to management or externally.

9. Make a public commitment to engaging with vessels, canneries, processors and other relevant facilities and workplaces to eliminate and remediate human rights or labour abuses when they are found, including well-substantiated allegations made by civil society and media organisations, and cease purchasing if problems prove intractable. This public commitment must involve:

- a. Full internal investigation of abuses in cooperation with relevant worker organisations, civil society or intergovernmental actors and, where applicable, enforcement agencies;**
- b. Interventions that prioritise the social and economic welfare of workers (e.g. compensation, new employment opportunities) and the protection of victims of trafficking, forced and bonded labour;**
- c. Time-bound plans of action to work with vessels, canneries, processors and other relevant facilities and workplaces—In consultation with relevant civil society or intergovernmental actors—to implement effective solutions to address human rights or labour abuses;**
- d. The immediate and permanent cessation of purchases from vessels, canneries, processors and other relevant facilities and workplaces unable/unwilling to verifiably comply with required social and labour standards within given timeframes;**
- e. For those vessels, canneries, processors and other relevant facilities and workplaces that are willing to comply, suspend purchases and continue to work with them toward compliance.**

Thai Union is currently rolling out the company's stringent Business Ethics and Labor Code of Conduct globally. All our suppliers are required to comply with its strict regulations. In Thailand first and third party audits are conducted against the Code.

Since January 2015, the company has stopped purchasing from 17 suppliers that were suspected of using forced or illegal labor, as part of our commitment to eliminate human rights and labor abuses from our



supply chain. We have reduced the number of vessels we purchase from in Thailand to around 400 from 2,000 to ensure we are purchasing legally caught fish and the workers in our supply chain are better protected.