



# Thai Union Group:

## Ethical Migrant Recruitment Policy

Issued by:

A handwritten signature in blue ink, appearing to read "Vorarat", written over a horizontal line.

(Mrs. Vorarat Lertanantrakool)  
Human Resources Director

Verified by:

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(Mr. Kulshaan Singh)  
Group Chief Human Resources Officer

Approved by:

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(Mr. Thiraphong Chansiri)  
President and CEO

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(Mr. Chan Shue Chung)  
Executive Director of TU group

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Public	
Policy	
<b>Ethical Migrant Recruitment Policy</b>	Date: 15 <sup>th</sup> January 2021 Version: 002/2021
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Issued by: Mrs. Vorarat Lertanantrakool	
Verified by: Mr. Kulshaan Singh	
Approved by: Mr. Thiraphong Chansiri and Mr. Chan Shue Chung	
Distribution List: All Thai Union Group Colleagues	
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<p>Thai Union is committed to conducting business with integrity, openness, and respect for universal human rights, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. We do not tolerate child labor, human trafficking and any forms of forced labor.</p> <p>The company promotes equal opportunities; non-discrimination standards on the basis of caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, or pregnancy and seeks to ensure consistent practices throughout Thai Union and its subsidiaries.</p> <p>Our recruitment and hiring processes must meet our obligations under the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights, and our own Business Ethics and Labor Code of Conduct. With appropriate operational controls in place, we can ensure workers are hired in way that complies with the law and conforms to international standards on discrimination, any forms of forced labor (debt-bondage, indentured and prison labor), child labor (younger than the legal minimum age), human trafficking and other social responsibility risks.</p> <p><b>Objectives</b></p> <p>The objective of this policy is to provide a set of principles to ensure that recruitment and hiring are managed consistently, professionally, fairly and transparently. The policy aims to ensure the safe migration and reduce the potential vulnerability of migrant workers to labor exploitation, including the worst forms of child labor, human trafficking and that the integrity of Thai Union is upheld. The policy seeks to ensure a fair balance between costs borne by migrant workers and Thai Union and its subsidiaries during recruitment processes.</p> <p><b>Scope</b></p> <p>This policy covers all aspects of recruitment and hiring for migrant labor throughout Thai Union and its subsidiaries. For the purpose of this policy, recruitment is defined as “when there is a vacancy for which sourcing and hiring activity is required.”</p>	





### **Migrant Labor & Supplier Approval Process**

Migrant workers must only be sourced from formally approved or registered/licensed third party suppliers (recruitment agency) or through direct application by workers to Thai Union. Wherever possible or to whatever extent desirable however, Thai Union and its subsidiaries will recruit workers directly without using a third-party supplier.

Where Thai Union or its subsidiary has a preferred supplier agreement in place for the provision of migrant labor, all labor must be sourced via these third-party providers.

Where local agreements preclude the use of agency labor these arrangements will be respected until they can be renegotiated or come to an end.

No supplier shall be utilized until it has signed and acknowledged to comply with Thai Union's Supplier Business Ethics and Labor Code of Conduct, this Ethical Migrant Recruitment Policy itself, and a service level agreement with Thai Union. Furthermore, no supplier can be utilized until it has been audited by Thai Union staff against our Code of Conduct (and other requirements, as relevant) Auditing by Thai Union and our NGO partners will be an ongoing process to ensure continued compliance with our Code of Conduct and implementation of fair and legal practices, and encourage continuous improvement of services.

#### **Procedures for recruiting workers**

- Thai Union or its subsidiary informs the approved recruitment agency of the job-related information, general conditions of work and remuneration as well as specific recruitment costs to be borne by the worker and Thai Union respectively (n.b. fees to be paid by Thai Union or its subsidiaries to the recruitment agency and other conditions and agreement with the recruitment agency shall also be agreed in advance and reflected in the service level agreement).
- The recruitment agency will interview the applicants for preselection according to advised and agreed upon recruitment criteria or other requirements determined by Thai Union or its subsidiaries.
- Pre-selected candidates' applications are filed and skill-tested and then short-listed.
- The applications of short-listed candidates are shown to Thai Union or its subsidiary for final selection.
- Recruitment agencies must ensure that selected workers are informed in their own language (or a language understood by the worker, consistent across all applicable languages used) and clearly understand and freely accept the terms and conditions of employment prior to recruitment. The selected candidates are shown and asked to sign the employment contract.
- Workers must be provided with copies of all relevant employment contracts in all applicable languages.
- Pre-departure training will be provided to the successful candidates. The training will cover terms and conditions of employment, repatriation, culture, safety, complaint mechanisms, relevant laws for working and living in Thailand, etc. This training and associated costs for the training,



except for travel to the training venue from a worker's home, will be paid for fully by Thai Union or its subsidiaries.

- Thai Union or its subsidiary and the approved recruitment agencies shall coordinate with the immigration and other authorities concerned to ensure that applicants who have been selected by employers have fulfilled the following requirements:
  - Visas or other forms of entry or departure permission.
  - Work permits or origin country labor cards.
  - Health insurances or health services.
  - Any other required regulation for the work permit.

### **Recruitment-related Fees & Cost**

Thai Union is committed to “zero recruitment fees” for migrant workers, which means the fees for recruitment services will be covered by Thai Union or its subsidiary.

- Thai Union or its subsidiary pays:
  1. All recruitment fees including the following:
    - Contract development or contract signing ceremony costs;
    - Recommendation or approval documents.
  2. Pre-departure training costs including accommodation and food during assigned training dates.
  3. Foods and drinking water during travelling from origin country appointed departure point (Myawaddy); to Thailand border to Thai Union or its subsidiary's factories.
  4. Transportation expenses from Thailand border to Thai Union or its subsidiary's factories.
  5. Costs of uniform, health and safety equipment.
  6. Medical check-up
- Employees pay:
  1. Home Country
    - Passport application fees including passport, photo and forms
    - Labor card or origin country required documents
    - Travel and food costs travelling to and from interview site, hospital (for medical check-up), passport processing facility, pre-departure training venue, contract signing ceremony venue, and to agreed departure point to Thailand
    - Accommodation costs during interview, passport processing and contract signing.

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## 2. Host Country - Thailand

- Visa costs and visa renewal
- Work permit documents and the renewal fees for every 2 years employment extension after initial recruitment 2 years period including
  - Work permit fee
  - Other expenses related to the employment extension
- Recruitment agencies should disclose and continue to share as updated or adjusted all charges and terms of business to Thai Union and its subsidiaries, ensuring transparency about the costs, i.e. costs associated with documentation and the recruitment service fees.
- Recruitment agencies must have in place a policy and procedure to ensure that their staff or subagents do not charge workers any additional fees beyond those agreed by Thai Union, its subsidiaries. Recruitment agencies must also conduct due diligence monitoring of any subagents utilized to ensure their overall compliance with Thai Union's Supplier Code of Conduct, this Ethical Migrant Recruitment Policy, and the Service Level Agreement with Thai Union.

### **Monitoring Compliance & Access to Remedy**

Recruitment agencies shall authorize Thai Union and its designated agents to engage in monitoring activities to confirm compliance with this Policy, including through announced or unannounced audits and grievance mechanisms. These mechanisms include internal processes such as human resources support, a confidential helpline and the Worker Welfare Committees. In addition, third party external and independent processes including helplines and investigation of complaints by local NGOs such as the Migrant Workers Rights Network (MWRN) and Issara Institute are also in place and accessible for all employees of Thai Union and its subsidiaries.

Thai Union and its subsidiaries will seek to work with the partner recruitment agencies to resolve non-compliance as the first response to non-compliance, except in the case of significant Policy violation. If remediation is required, the agencies are expected to inform Thai Union and its subsidiaries and implement corrective, time-bounded action plan.

Where workers are negatively impacted from noncompliance to this Policy, they shall be entitled to effective remedies provided or facilitated by Thai Union and/or recruitment agents. Agencies found charging workers illegal and/or irregular fees, either directly or through subagents, beyond those agreed in advance between Thai Union or its subsidiary and the recruitment agency, will be terminated following procedures in place to ensure no negative impact to recruited workers. The recruitment agency shall then also be required to repay all irregular fees to the applicant.

