

# UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2020-2021

This statement is written in compliance with the requirements under the UK Modern Slavery Act 2015, with particular reference to Section 54 Transparency in Supply Chains.

The purpose of this statement is to describe efforts by Thai Union Group PCL (TU) to prevent, detect, and remedy violations of human rights, particularly modern slavery within our operations and supply chains. The statement covers key activities and progress from July 2020 to October 2021. In this Statement, we still highlight Statement key policies and initiatives that were established before July 2020 but are still active during the reporting period. To understand our previous activities related to modern slavery, please refer to the previous updates of the Statement available on our Thai Union Website.

In summary, key highlights of recent activities & achievements for enhancing our due diligence on modern slavery and forced labor are:

- Publishing our [commitment to implement the Employer Pays Principle for recruitment](#) of migrant workers. Starting in January 2022, TU will bear all recruitment-related fees and costs for all migrant workers, applicable to all new recruitment activities initiated by the Company;
- Publishing our [Anti-discrimination & Anti-harassment Policy](#);
- Publishing our Global [Non Reprisal Policy](#) to create a positive workplace culture that prevents unfair retaliation against employees;
- Strengthening the management of workers' voice mechanisms by [implementing guidelines to classify and rate the severity of workers' complaints](#) to ensure the raised issues are addressed in a timely and sensitive manner;
- Publishing our [guideline for determining appropriate remedial actions](#) for affected workers in the event the company identifies that it has caused or contributed to an adverse impact to workers' rights;
- Updating our [Human Rights Policy](#) and [Human Rights Risk Assessment](#);
- Conducting our first [Living Wage Assessment](#) covering our global workforce across our own operations and our subsidiaries in the supply chain
- Publishing our [Policy for the Responsible Sourcing of Tuna](#) to reinforce our commitment to ensure safe and legal labor on board tuna fishing vessels in our supply chain;
- Releasing our [Policy for the Responsible Sourcing of Palm Oil](#) to lower the risk of deforestation and human rights abuse in our palm oil supply chain;
- Continuing to raise social compliance standards of fishing vessels in our supply chain through the continuous implementation of our [Vessel Code of Conduct \(VCoC\) and Vessel Improvement Program \(VIP\)](#), including extending the scope to investigate labor recruitment practices by our suppliers and the agencies they use;
- Publishing aggregate results of the third-party social audit of fishing vessels in our supply chain against the VCoC in the [2020 Annual Sustainability Report](#);
- Rolling out additional policies and measures to protect the health & safety of workers in our operations amid the global COVID-19 pandemic. For example, we proactively implemented COVID-19 testing at our own cost for more than 27,000 employees in the province of Samut Sakhon in early 2021;
- Continued collaboration with partner NGOs for capacity building of our workers and suppliers on labor rights and addressing emerging labor issues within our facilities and supply chains;

- Receiving the number two ranking globally in the Food Products Industry Index of the [Dow Jones Sustainability Indices \(DJSI\)](#), with industry best-in-class 100<sup>th</sup> percentile rankings in a number of areas, including Codes of Business Conduct, Social Reporting and Human Rights;
- Receiving the number one ranking on [the Seafood Stewardship Index \(SSI\)](#) for the second consecutive time for our progress in delivering the United Nations Sustainable Development Goals (UN SDGs). The Company's actual performance was measured by the independent group and was assessed to be first in three out of the five areas – governance and strategy, traceability and social responsibility.

## 1) ABOUT THAI UNION

Thai Union is the world's seafood leader, bringing high quality, healthy, tasty and innovative seafood products to customers across the world for more than 40 years.

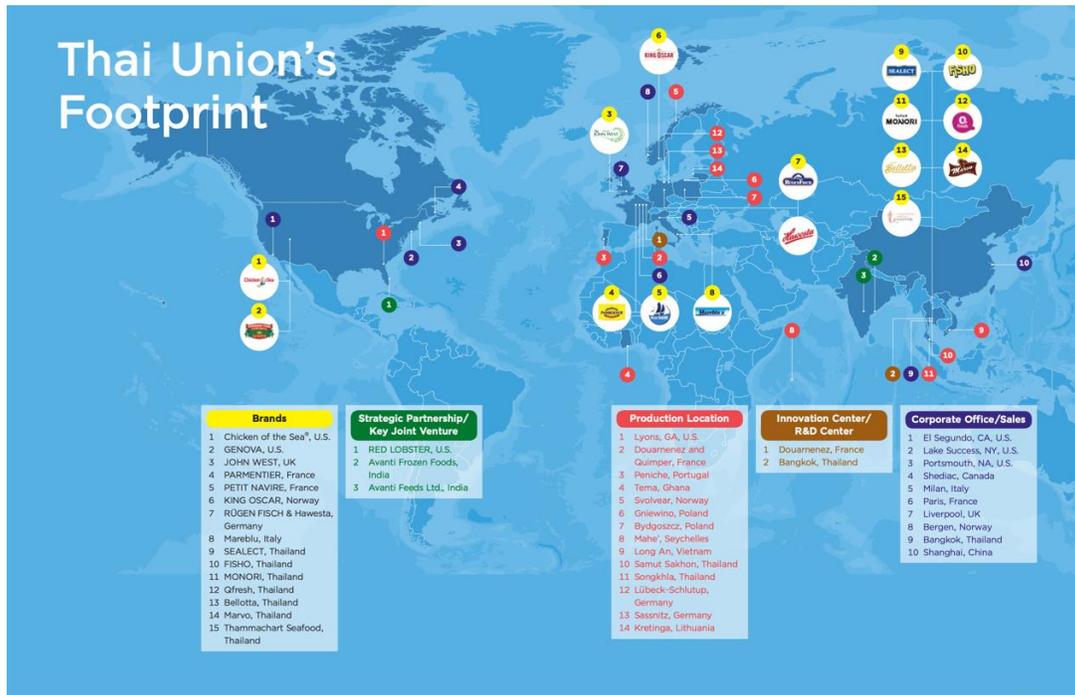
Today, Thai Union is regarded as one of the world's leading seafood producers and is one of the largest producers of shelf-stable tuna products with annual sales exceeding THB 132.4 billion (US\$ 4.2 billion) and a global workforce of more than 44,000 people who are dedicated to pioneering sustainable, innovative seafood products.

The company's global brand portfolio includes market-leading international brands such as Chicken of the Sea, John West, Petit Navire, Parmentier, Mareblu, King Oscar, and Rügen Fisch, Thai-leading brands SEAELECT, Fisho, Qfresh, Monori, Bellotta and Marvo, and ingredient and supplement brands UniQ™ BONE, UniQ™ DHA and ZEA Vita.

As a company committed to innovation and globally responsible behavior, Thai Union is proud to be a member of the United Nations Global Compact, and a founding participating company of the International Seafood Sustainability Foundation (ISSF). In 2015, Thai Union introduced its [SeaChange®](https://seachangesustainability.org) sustainability strategy. Find out more at [seachangesustainability.org](https://seachangesustainability.org). Thai Union's on-going work on sustainability issues was recognized when the company was listed on the Dow Jones Sustainability Indices (DJSI) for the eighth consecutive year in 2021, and ranked number two in the world on the Food Products Industry Index. Thai Union was also named to the FTSE4Good Emerging Index for the fifth straight year in 2020.

Our main products are ambient seafood and value-added products such as ready-to-eat meals and pet food. In addition to tuna, we produce sardines, mackerel, salmon, shrimp, crab and other seafood-based products.

Thai Union has 14 production locations in 11 countries in North America, Europe, Africa, and Asia. A full list of Thai Union's brands, subsidiaries and product categories can be found on our website [here](#).

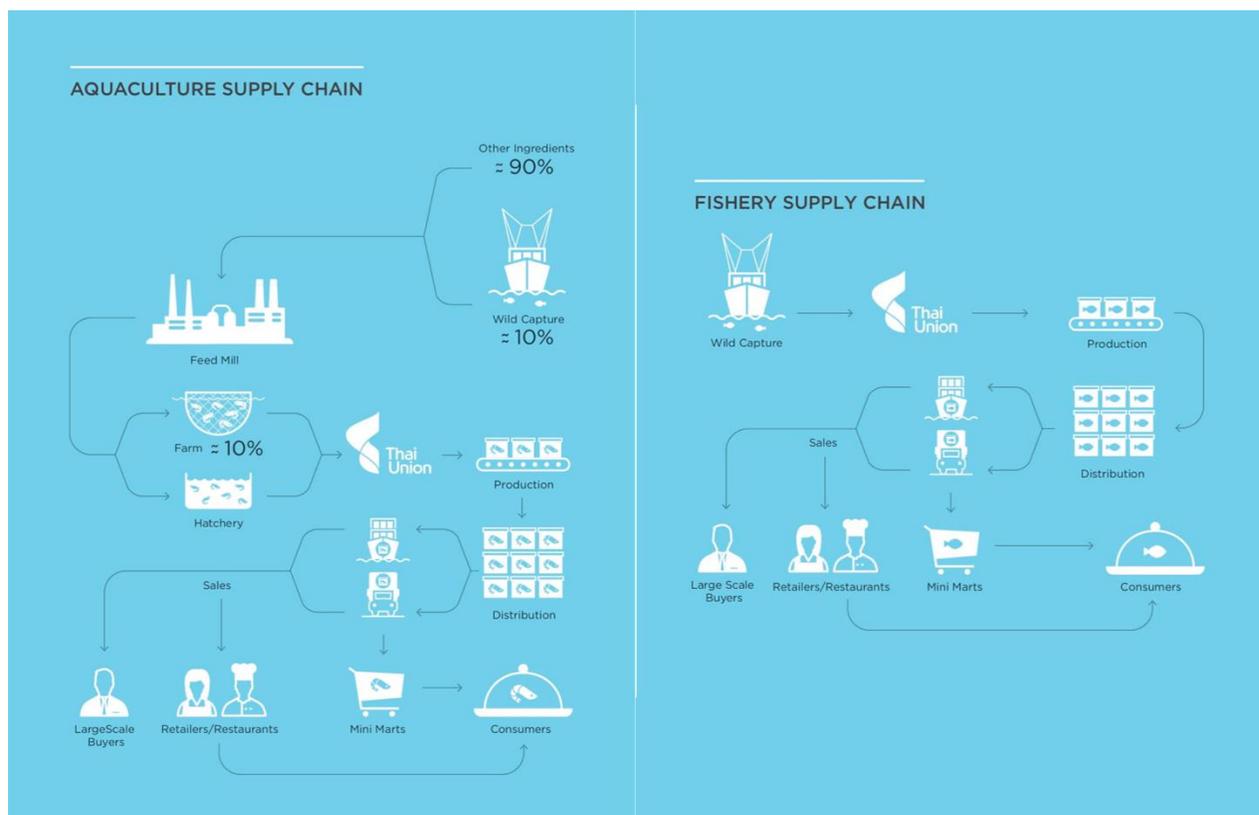


## 2) THAI UNION'S SUPPLY CHAINS

Seafood supply chains are complex, particularly where multiple species are involved. Thai Union is a processor. Globally, we do not own fishing vessels and own a very small number of aquaculture farms. Seafood raw materials are therefore sourced from suppliers from oceans and aquaculture operations around the world, and we use our market position to drive sustainable practices.

Thai Union sources from six main categories of seafood: tuna, shrimp, salmon, sardine, mackerel and cephalopod.

The supply chains for key seafood raw materials can be visualized as the following:



For transparency, we published the sourcing locations of key seafood species in our annual [2020 Sustainability Report](#). In addition, in collaboration with WWF, we published the [Sourcing Transparency: Wild Caught Fish and Shellfish Report](#) for our European operations, including species sourced and locations.

In 2020, as part of our continued commitment to transparency, we took part in the [Ocean Disclosure Project](#) (ODP), a global platform launched in 2015 by the Sustainable Fisheries Partnership to allow seafood companies – including retailers, suppliers and fish feed manufacturers – to publicly share the sourcing of their wild-caught seafood. Through the ODP we have published our global supply chain data in detail, including both wild-caught and farmed seafood.

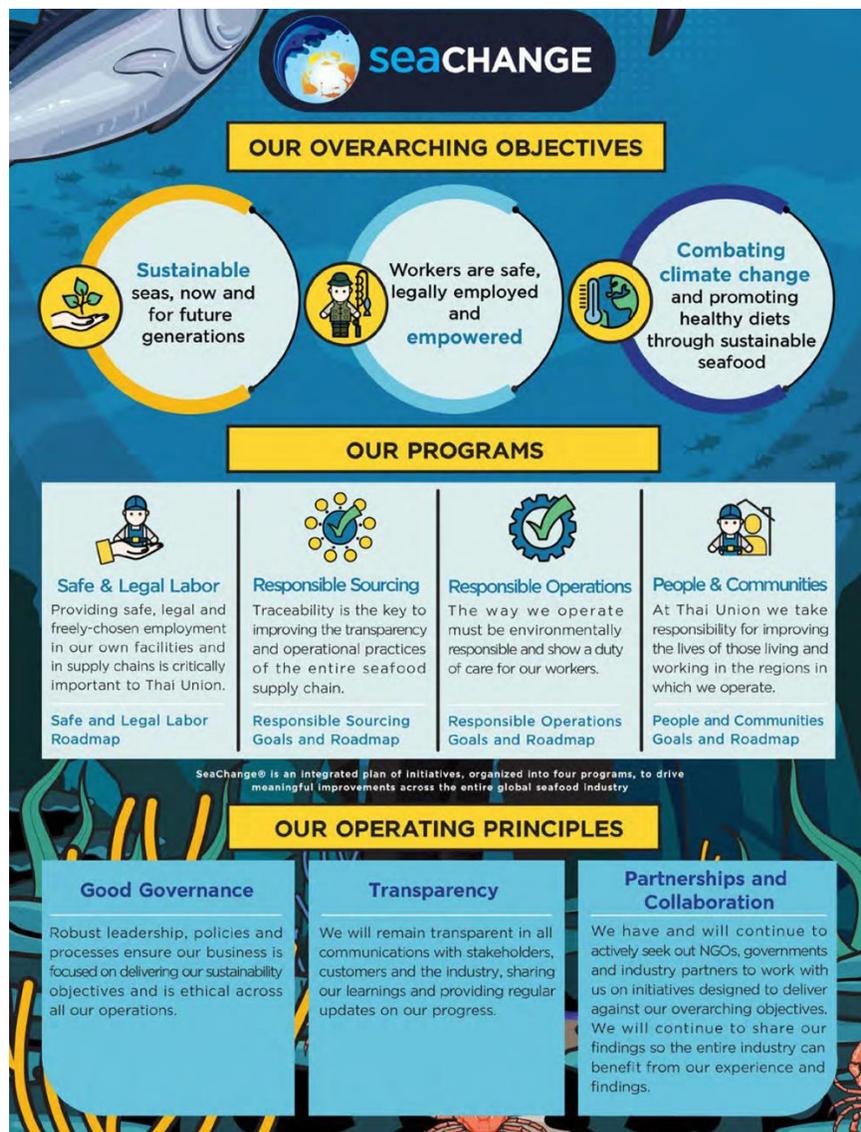
In addition to seafood raw materials, we also source a variety of food ingredients, packaging materials, and logistic services from suppliers based in the countries where we operate.

### 3) THAI UNION'S COMMITMENT ON HUMAN RIGHTS AND SUSTAINABILITY

Thai Union's mission is to be the seafood industry's leading agent of change, making a real positive difference to our consumers, our customers and the way the category is managed. In line with this mission, we are taking a leading role in tackling human & labor rights abuses, including modern slavery and human trafficking within the seafood industry in Thailand and globally.

#### 3.1) SeaChange® Strategy

Our policies on human rights, including modern slavery and human trafficking, and broader sustainability areas are guided by [SeaChange®](#) – our sustainability strategy, designed to deliver real and lasting changes in the way that we operate in the wider Thai and global fishing industries. SeaChange® is an integrated plan of initiatives organized into four programs. One of the pillars of SeaChange® is “Safe & Legal Labor,” which aims to provide safe, legal, and freely-chosen employment in our own facilities and supply chains. Our strategy therefore aims to eliminate a wide range of unethical labor practices including modern slavery and human trafficking.



The 2025 milestones under the “Safe & Legal Labor” pillar are as follows:

- We will treat all workers, whether migrant or local employees, fairly and with dignity. They will have safe and freely-chosen employment supported by ethical recruitment practices.
- Our land based operations and supply chains will comply with our Business Ethics and Labor Code of Conduct, and at sea with our Vessel Code of Conduct and Vessel Improvement Program.
- Through education and open dialogue, we will empower our workers, giving them a voice today and into the future.
- We are committed to leading an ongoing and active dialogue with industry, government and civil society to ensure lasting improvements in labor practices across the entire industry and beyond.

While this sustainability work is designed to have a positive impact on the seafood industry, the milestones we achieve under our programs will also deliver against the UN Sustainable Development Goals (SDGs), particularly for the SDG 2 (“Zero Hunger”), SDG 8 (“Decent Work and Economic Growth”), and SDG 14 (“Life below Water”). More specifically, achievements under the “Safe & Legal Labor” pillar will contribute to the SDG 8.7 to end modern slavery.

### 3.2) Global Leadership in Sustainability for Industry Transformation

To serve as a truly effective change leader, we align our sustainability with globally recognized collective sustainability priorities and programs. Our participation in sustainability and industry alliances and initiatives include:

- [The United Nations \(UN\) Global Compact](#) – Thai Union has been a member of the United Nations (UN) Global Compact since 2013. As a member, Thai Union upholds the Global Compact’s 10 principles on the areas of human rights, labor standards, environment, and anti-corruption, including the commitment to eliminate all forms of forced and compulsory labor. The principles have been incorporated into a number of the company’s human rights related policies (see Section 5 below). We are also a founding member of the [UN Global Compact Local Network for Thailand](#) (GCNT), whose objective is to promote knowledge sharing and implementation of the Global Compact’s 10 principles in Thailand. In 2018, we officially launched the UN GCNT, along with other founding members. We report annually on our progress in our sustainability reports.
- [The Seafood Task Force](#) – Thai Union has been a proud and active member of the [Seafood Task Force](#), which is an industry-led coalition tackling human rights and environmental issues in Thailand. Each member organization commits to supporting progress against the Task Force objectives of strengthening supply chain oversight in the Thai seafood industry.
- [International Seafood Sustainability Foundation \(ISSF\)](#) – Thai Union is a founding member of the ISSF, whose objective is to improve the sustainability of global tuna stocks.
- [National Fisheries Institute \(NFI\) Crab Council](#) – Thai Union is a founding member of the NFI Crab Council, an association of U.S. seafood companies working to promote crab sustainability.
- [Global Sustainable Seafood Initiative \(GSSI\)](#) – Thai Union is a funding partner of GSSI whose mission is to ensure confidence in the supply and promotion of certified seafood as well as to promote improvement in the seafood certification schemes.
- [Seafood Business for Ocean Stewardship \(SeaBOS\)](#) – in June 2017, Thai Union signed a groundbreaking [pledge as part of its membership in the \(SeaBOS\)](#), committing to improve operations as well as challenge the rest of the seafood industry to follow, all with the goal of helping the world achieve the United Nations Sustainable Development Goals (SDGs). As one of the signatories, Thai Union pledged to work diligently to eliminate Illegal, Unreported and Unregulated (IUU) products and any form of modern slavery in the supply chain. In September 2019, Thai Union and Charoen Pokphand Foods PCL (CPF) issued [a joint statement](#) on tackling modern slavery to ensure their supply chains are free of illegal labor.

- [World Economic Forum](#) – in June 2017, Thai Union committed to the World Economic Forum's [Tuna 2020 Declaration](#). This includes a pledge to eliminate any form of slavery and ensure suppliers at least meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and International Labour Organization's Conventions and Recommendations, by 2020. A [recent review](#) shows significant progress in meeting commitments by the signatories of the Tuna 2020 Declaration.
- [Greenpeace](#) – in July 2017, under [a joint agreement with Greenpeace](#), Thai Union made additional commitments to support current best practice fisheries, improve other fisheries, reduce illegal and unethical practices from global supply chains, and bring more responsibly-caught tuna to key markets. The commitments include enhanced labor rights due diligence on vessels supplying to Thai Union and social compliance for Thai Union facilities, among others. In 2018, we released a report on [progress against the Greenpeace agreement](#). Finally, in 2019 Marine Resources Assessment Group (MRAG) conducted an [independent audit](#) of our progress against the agreement.
- [The Bali Process Government and Business Forum](#) - In 2018, Thai Union continued to support the [Bali Process Government and Business Forum](#), including the endorsement of its Acknowledge, Act and Advance (AAA) Recommendations as a pathway for action to achieve Target 8.7 of the UN Sustainable Development Goals (SDGs). The Bali Process allows governments to better engage the private sector to combat human trafficking, forced labor and related exploitation. Through this initiative, CEOs and business leaders can advise government on how to prevent and combat human trafficking and related abuses and share experiences on best practices.
- [Mekong Club's Business Pledge Against Modern Slavery](#) – In August 2018, we became a signatory to the Business Pledge Against Modern Slavery. As a signatory, we declare our commitment to help end the crime of modern slavery across Asia and work to collect and share relevant information to inform business decisions, promote education and training, and contribute to the development of tools to help prevent and address modern slavery.

We also work with other stakeholders including NGOs to implement our human rights due diligence. Specific collaboration with partner organizations is described in the subsequent sections of this statement.

Our progress on sustainability have earned us various awards and recognitions by leading organizations around the world. Recent human rights-related examples during the period covered by this Statement include:

- In 2021, we received the number two ranking globally in the Food Products Industry Index of the [Dow Jones Sustainability Indices \(DJSI\)](#) Emerging Markets, with industry best-in-class 100<sup>th</sup> percentile rankings in a number of areas, including Codes of Business Conduct, Social Reporting and Human Capital Development;
- In 2021, we received the number one ranking on [the Seafood Stewardship Index \(SSI\)](#) for the second consecutive time for our performance delivering towards the United Nations SDGs. The company's actual performance was measured by the independent group and was assessed to be first in three out of the five areas – governance and strategy, traceability and social responsibility. The SSI assessed the contribution of the world's 30 largest seafood companies to the UN SDGs;
- In 2021, we received the [Best Sustainability Award](#) from the Stock Exchange of Thailand (SET) for a listed company with market capital between THB 30-100 billion. In particular, Thai Union was praised for exhibiting ethical recruitment and legal labor through its global sustainability strategy, SeaChange®.
- In 2020 – 2021, for two consecutive years we received [The Human Rights Award](#) in the private sector category by the Rights and Liberties Protection Department of the Thai Ministry of Justice.

The company was recognized as a role model organization for its best practices on human rights to ensure protections for all workers across the Company and through its supply chains;

- In 2021, Dr. Darian McBain, Thai Union’s then Group Director of Sustainability, was recognized as [one of 10 SDG Pioneers by the United Nations Global Compact](#). SDG Pioneers are business leaders selected by the UN Global Compact for doing an exceptional job to advance the Sustainable Development Goals (SDGs) through the implementation of the UN Global Compact Ten Principles on human rights, environment, labor and anti-corruption.
- In 2020, for the fifth straight year, we remained on the [FTSE4Good Emerging Index](#) managed by FTSE Russell, a leading global provider of benchmark, analytics, and data solutions for institutional and retail investors. The Index is designed to measure the performance of companies demonstrating strong Environmental, Social and Governance (ESG) practices.

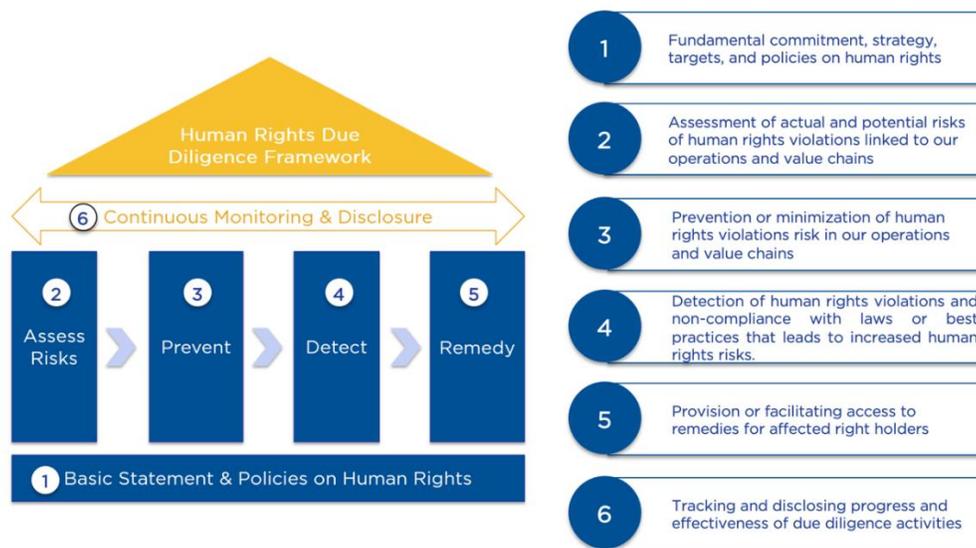
The latest list of awards and recognitions can be found on the SeaChange® webpage [here](#).

#### 4) HUMAN RIGHTS RISK ASSESSMENT

The seafood industry is generally labor intensive and has a complex supply chain with many stakeholder groups involved. The industry faces real challenges like human trafficking, human rights abuses and labor exploitation. In most cases, these issues occur outside the direct operational control of a single company, and the complexities of the seafood industry prevent any single company or institution from solving them alone.

Assessment of potential human rights risks is one of the key pillars of Thai Union’s [Human Rights Due Diligence Framework](#) (“Pillar 2 – Assess Risk”). Findings from risk assessments help us design appropriate and proportionate human rights policies as well as subsequent measures to further prevent, detect and remedy non-compliance by our staff and suppliers.

#### Component of the Framework – Brief Description of Six Pillars



#### 4.1) Risk Assessment Methodology

Thai Union identifies human rights risks, including modern slavery and forced labor, in our supply chain through supply chain mapping and risk analysis. Our suppliers are segregated into critical and non-critical suppliers based on both spend and risk assessment through audits and social dialogue. We engage with civil society and third parties to assist with this process.

We conduct an activity-based risk analysis for all our suppliers to establish which suppliers are potentially high risk for certain activities. This can be as a result of a variety of external factors such as the location where a supplier operates, the nature of the work, and whether there is any third-party involvement.

Previous risk assessment activities included:

- In 2015, a human rights risk assessment was conducted to help identify and visualize potential human rights risks in our **fisheries supply chain**. Global consultation with internal and external stakeholders was conducted to discuss sustainability risks.
- In 2016, a human rights risk assessment was conducted **for packaging, food ingredients, and the shrimp supply chain in Thailand**.
- In 2018 and 2019, we conducted two separate 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.
- In 2020, we repeated the desk-based research on human rights risk at a country level using a similar methodology to the previous exercise in 2018-19 but with more updated data sources. In addition, we reviewed the social audit results of fishing vessels in our supply chain. The audits were conducted by third parties against our [Vessel Code of Conduct \(VCoC\)](#) and allowed more granular understanding of human rights risks specially in our supply chain.

Most recently, in 2021 we updated our human rights risk assessment, once again drawing on the most recent publicly available information sources as well as social audit findings. In addition, in 2020-21 we commissioned an independent human rights expert to conduct a human rights risk assessment for the supply chain of Chicken of the Sea Frozen Foods (COSFF), under our U.S.-based subsidiary importer and distributor of frozen seafood. Finally, we conducted a special desk-based human rights risk assessment focusing on the potential impact on the rights of indigenous people from our operations and supply chain.

In particular, we have identified the following eight salient human rights risks in 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 the lack of a worker voice;
- Child labor;
- Excessive overtime;
- Unsafe and unhealthy working conditions;
- Community health and safety in the event of major incidents from production plants;
- Consumer health and safety.

Further details on the risk assessment methodologies and assessment results are published [here](#).

## 5) POLICIES ON MODERN SLAVERY, HUMAN TRAFFICKING, AND HUMAN RIGHTS

Thai Union issued the following policies to support the achievement of the milestones on human rights under our SeaChange® strategy:

### 5.1) [Human Rights Policy](#)

Launched in 2018 and subsequently updated in 2021, the policy states the commitment to use our commercial leverage and leadership role to address human rights issues in our value chain but also in the wider global seafood industry. In line with the previously issued [Business Ethics and Labor Code of Conduct](#), the Human Rights Policy reiterates our commitment to respect universal human rights, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The recent update in 2021 explicitly states our commitment to respect the rights of people in the vulnerable groups, customary resource users, and indigenous people.

### 5.2) [Business Ethics and Labor Code of Conduct \(CoC\)](#)

Launched in 2015, [the Business Ethics and Labor Code of Conduct](#) (CoC) embodies our commitment to conduct business with integrity, openness, and respect for universal human rights and core labor principles throughout our operations. The CoC is based on 12 Fundamental Principles grounded in internationally recognized standards. The Code is applicable to all Thai Union employees, suppliers, and any sub-suppliers employed by primary suppliers in business with Thai Union. Separately, we recently issued a [Non Reprisal Policy](#) to protect any whistleblowers reporting actual or suspected violation of the codes (see Section 5.4).

In particular, the Code states:

- All laws and regulations are complied with in the countries in which the supplier operates.
- Forced labor, whether in the form of indentured labor, bonded labor or other forms, is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited.

We have integrated the CoC into our recruitment and procurement procedures. All Thai Union employees are required to acknowledge and sign the CoC, as are all primary suppliers. New suppliers and new staff must sign the CoC prior to working with Thai Union.

In 2018, we created and published a separate [Suppliers' Business Ethics and Labor Code of Conduct](#). The Suppliers' CoC shares the same common principles with the previously issued CoC, but focuses in more detail on supplier requirements, particularly with respect to ethical recruitment.

As of today, 100 percent of Thai Union full-time employees based in Thailand have signed acknowledgement of the Code. Also, 100 percent of contracted tier-one suppliers in Thailand for shrimp, fish, chicken, food ingredients, packaging, and logistics services have signed acknowledgement of the Code.

Thai Union will seek to work with the suppliers to resolve non-compliances against the Code. If remediation is required, suppliers are expected to inform Thai Union and implement a time-bounded corrective action plan, which is verified through a reaudit. The timeline for remediations depend on the severity of non-compliances in question. Failure to implement timely remedial action can lead to the business relationship with the supplier being suspended until proof of rectification is available. Thai Union reserves the right to take legal action and report illegal activities to the relevant

authorities and trade associations. Audits of our operations and suppliers against the CoC are described in sections 6.1 and 7.3 below.

### 5.3) Anti-discrimination & Anti-harassment Policy

Published in 2021, the policy states our commitment to prohibit all forms of discrimination, sexual harassment, non-sexual harassment in the Company's physical workplaces and in all work-related interactions and communications. The Policy also provide definitions of discrimination and harassment and establishes confidential and anonymous channels to report actual or suspected violations against the Policy to promote a culture of speaking up without any fear of retaliation, supported by our Non Reprisal Policy (see Section 5.4).

### 5.4) Non Reprisal Policy

Published in 2021, the Policy reinforces our commitment to conduct business with integrity, openness, and respect for universal human rights, specifically in line with our CoC Principle 10 "Workers have access to fair procedures". In particular, the Policy provides definition of retaliation, establishes requirements to keep confidential whistle blowers' identities and to ensure confidential investigation, as well as establishes measures to protect employees from potential retaliation.

### 5.5) Ethical Migrant Recruitment Policy

Migration and recruitment of migrant workers is recognized as one of the highest risk areas for workers to become involved in human trafficking, forced labor or debt bondage. Thai Union's migrant workforce in Thailand is primarily composed of workers from Myanmar and Cambodia. Recognizing this, Thai Union has focused on reducing the potential for abuse and extortion by agents and brokers in recruitment of migrant workers. As a result, in 2016 we issued and began to implement an Ethical Migrant Recruitment Policy that covers all aspects of recruitment and hiring of migrant labor throughout Thai Union and its subsidiaries. The policy ensures zero recruitment fees for migrants and full transparency about migrant workers' rights and terms of employment contracts.

In 2019, an [independent evaluation](#) of our Ethical Migrant Recruitment Policy was completed and published so that broader community working on ethical recruitment can learn from our experience. The six-month evaluation of the policy was led by ethical trade consultancy Impactt and commissioned by Humanity United and The Freedom Fund. Among other things, the report found that the Policy has resulted in a large reduction in recruitment-related costs paid by workers, an increase in job applicants, and reduced labor turnover.

In January 2021, we updated the [Ethical Migrant Recruitment Policy](#) to reflect our commitment to cover an additional cost for the workers in the recruitment process. Finally, we recently [committed to implement the full Employers Pay Principle](#) for all recruitment of migrant workers for our Thailand-based operations, starting from January 1, 2022. In practical terms, the company will bear all recruitment-related fees and costs for all migrant workers, applicable to all new recruitment activities initiated by Thai Union after the implementation date. The current Ethical Migrant Recruitment Policy will soon be updated to reflect the Employers Pay Principle and will be published shortly on our website.

It is important to note that from 10 July 2020 – when the UK Modern Slavery Transparency Statement was last published until 31 October 2021, Thai Union was not able to recruit any migrant workers through regular process under the Ethical Migrant Recruitment Policy due to COVID-19 related restriction on travel and border shutdown.

We have fulfilled labor demand by recruiting walk-in applicants, both Thai and migrants, who already resided in Thailand. To prevent risk of forced labor and excessive recruitment fee in line with our ethical recruitment approach, we do not use third-party agents for walk-in application and instead

advertise job opening via relevant media. We also directly facilitate the process of applying or renewing official documentation such as work permit and visa, to ensure that we have an oversight over the entire process

## 5.6) Diversity Policy

In 2018, we issued our [Diversity Policy](#) to ensure a diverse work environment and further reinforce the prohibition of discrimination in any aspect of employment, in line with the previously issued Business Ethics and Labor Code of Conduct. Amongst others, the policy promotes gender diversity as important criteria in the appointment process and proactive reviews of hiring practices to reduce unintended bias.

## 5.7) [Vessel Code of Conduct \(VCoC\)](#) & Vessel Improvement Program (VIP)

Thai Union set out our commitment to the safe and fair treatment of our workers in 2015 with the publication of our [Business Ethics and Labor Code of Conduct](#). On 27 December 2017, we published our Vessel Code of Conduct (VCoC) and Vessel Improvement Program (VIP) which is an extension of the Business Ethics and Labor Code of Conduct. The 12 'Fundamental Principles' apply to our business and frame both codes of conduct. However, in the VCoC, the clauses have been tailored for application to fishing vessels to reflect the unique set of conditions that exist working at sea. Our intention is that the implementation of this program of work will provide guidance to the fishing vessels that we source from and improve the labor and working practices of the fishing sector.

Thai Union sources seafood from fishing vessels across the world that have different characteristics by way of different types of vessels, fishing gear, flag States and crews. The seafood is processed in factories (on land) and sourced from a wide range of places including Europe, U.S., Asia and others. Our expectation is that all of the fishing vessels that we source from are continuously improving in their efforts to meet the clauses in our VCoC and we are committed to monitoring their performance. Thai Union wants to work with its suppliers and partners to continuously improve conditions on board vessels. Engaging and working with the fishing vessels, which Thai Union does not own or operate, the non-governmental organizations that promote the improvement of labor and working practices of the fishing sector, and the governments that are the coastal and flag States of the vessels will be key to driving change within the industry.

Following the launch of the VCoC, in 2018 we published the [Guidance to the Thai Union Fishing Vessel Improvement Program and Code of Conduct](#) that provides explanations and clarifications on the VCoC clauses and assists in the ability of our suppliers, if needed, to improve their level of compliance. Subsequently in 2020, we published an updated [VCoC version 1.1](#) and corresponding [updated Guidance document](#). The VCoC is available in Korean, Indonesian, Spanish, Thai, Traditional Chinese and Simplified Chinese to facilitate suppliers' understanding.

Since 2020, TU has been working with consultants to extend the VCoC to be able to conduct recruitment mapping exercises of our suppliers as part of the audit program. Audits against the VCoC are described in the sections 7.1 and 7.2. Capacity building activities for suppliers to meet the VCoC are described in section 8.4.

## 5.8) Vessel Documentation Requirements to Prevent Illegal, Unreported and Unregulated (IUU) Seafood

We work with the Royal Thai Government and other competent authorities to drive port-state measures to eliminate Illegal, Unreported and Unregulated (IUU) seafood from our supply chains. In

Thailand, we have implemented a robust vessel-to-processor traceability system that cross references Marine Catch Purchase Documentation (MCPD) with the Thai Department of Fisheries. In addition to addressing IUU, this process works to ensure that labor is legal through crew manifests (Port In and Port Out certification to ensure no one is lost at sea), captain's licenses, vessel registration details, gear type registration, legal employment through contracts and pay slips for crew members, number of days spent fishing and catch data.

## 5.9) Global Whistleblower and Investigation Policy

In 2019, we issued a [Global Whistleblower and Investigation Policy](#) to provide specific guidance on the whistleblowing system operation and for fairly investigating any violation and/or potential violation of the Thai Union Employees Code of Conduct, Group or local Policies or any applicable Laws or Regulations. The Policy was announced concurrently with the launch of a [new whistleblowing platform](#) for all staff and workers to ensure strict compliance with ethical and legal standards in the workplace, including those related to labor rights.

## 6) Monitoring & Oversight Measures Addressing Modern Slavery and Unethical Labor Practices Within Our Own Operations

### 6.1) Audits of Thai Union's Own Facilities

Our own factories are subject to internal audits as well as world recognized external verifications and audits by third-party certification bodies working to promote standard labor practices. These include the Ethical Trade Initiative (ETI) Base Code; Amfori BSCI; SMETA, as well as a number of retailer specific programs to audit and verify safe and legal labor conditions.

Since 2016, we have conducted an annual program of internal audits of our Thailand-based facilities against Thai Union's Business Ethics and Labor Code of Conduct, Ethical Migrant Recruitment Policy, and applicable labor law. The program covered nine facilities in 2016 and expanded to all facilities under Thai Union's subsidiaries in Thailand from 2017 onward. Based on the audit results, the facility management team must submit a time-bound remedial action plan to address issues of non-compliance.

### 6.2) Worker Voice & Grievance Channels

We provide several grievance and whistleblowing channels for reporting unethical treatment of workers in our operations and our supply chains. Any Thai Union employees, contractors, suppliers and their employees may report actual or suspected breaches of the CoC, including practices of modern slavery and forced labor, to Thai Union confidentially and anonymously. These grievance channels provide workers with a voice and allow Thai Union to monitor incidences and patterns of unethical labor practices, including modern slavery and forced labor, that may not be detected through audits. These channels are as follows:

- [Speak Out – the Thai Union Compliance reporting hotline](#) – In 2019, Thai Union launched a new whistleblowing platform for all staff and workers to ensure strict compliance with ethical and legal standards in the workplace. Developed in partnership with Navex, a recognized, reliable and independent provider of global compliance solutions, Speak Out – the Thai Union Compliance Reporting Hotline is available online and through toll-free numbers reachable from 15 countries at all times, with complete anonymity available. Through the platform, all workers worldwide can report

any concerns related to violations outlined in Company policies, the Code of Conduct, or any fraud, abuse, or other misconduct in the workplace. The platform can be accessed [here](#).

- **Employee Relations (ER) Patrol** – at most Thai Union sites in Thailand, ER teams conduct regular “line walk” across various departments and lines during working hours. During the walk, the ER team will hold informal conversations with workers to gauge their level of work satisfaction and concerns. This avenue also provides convenient opportunities for workers to raise concerns or complaints if they are too busy to use other channels.
- **Confidential Email** – Anyone can report actual or suspected breaches of the CoC by our employees or our suppliers through a confidential email ([labor.coc@thaiunion.com](mailto:labor.coc@thaiunion.com)). This confidential email is applicable for all Thai Union sites, offices, and suppliers globally.
- **Internal hotlines** – Thai Union employees can call site-specific hotlines to seek help, request consultation on employee relation issues or report grievances anonymously.
- **Suggestion boxes** – Each Thai Union factory in Thailand provides a suggestion box for workers to anonymously report grievances.
- **Human Resources Clinics** – Each Thai Union factory in Thailand sets aside dedicated time for any workers to seek consultation on employee relation issues as well as report grievances confidentially.
- **Welfare Committee** - In Thailand, an employer with at least 50 workers is legally required to establish a welfare committee whose role is to provide consultations and opinions about welfare issues that are beneficial to the company and its employees. The committee will also monitor, control and take care of the provision of welfare from employers for employees and generally will be encouraged to work to enhance social dialogue opportunities between the company and its employees. In Thailand, all of our factories have established a welfare committee. Starting in 2016, the Migrant Worker Rights Network (MWRN) has worked with Thai Union to promote and support our migrant workers’ election onto the committee, to ensure that their voice is represented. Further information about our work on the Welfare Committee can be found in a short case study [here](#).
- **Issara Institute’s physical outreach, independent helpline, smartphone app, and social media platform** - Since 2014, we have partnered with the Issara Institute, an NGO tackling issues of human trafficking and forced labor, to improve conditions for workers in Thailand. In 2015, we provided workers with access to the Issara helpline, provided free of charge and available in five languages to accommodate migrant workers. Anyone can report issues of concern or submit requests for help independently of Thai Union management. The details of the helpline are provided in posters at our factories and the ports in which we operate. We have actively addressed key issues uncovered through this grievance channel. We will continue to partner with the Issara Institute and other NGOs to strengthen access to grievance mechanisms such as hotlines in our facilities and supply chains.

Thai Union has also taken other steps to support a stronger worker voice at an industry level through advocacy such as announcing our [public support](#) for the establishment of the International Transport Workers’ Federation Fishers’ Rights Network, and also the Thai government’s ratification of International Labour Organization Convention 87 on Freedom of Association and Convention 98 on Collective Bargaining.

Finally, in 2019 we began the “*Tell Us*” project” to strengthen worker voice mechanisms in our key processing facilities in Thailand. The project was implemented by Verité in collaboration with Thai Union. The baseline assessment of the worker voice mechanism was conducted to identify key gaps.

As a result of the “*Tell Us*” project, in 2020 we issued a global [Non Reprisal Policy](#) as explained in Section 5.4. In addition, we issued [guidelines to classify and rate the severity of workers’ complaints](#) to ensure that raised issues are addressed in a timely and sensitive manner. Finally, to ensure that workers are provided with remedies in the events where we have caused or contributed to an adverse impact to workers’ rights, we published a [guideline for determining appropriate remedial actions](#).

## 7) Monitoring & Oversight Measures Addressing Modern Slavery and Unethical Labor Practices Within Our Supply Chain

Thai Union maintains a rigorous process to screen and approve potential suppliers before we can source from them. The screening and approval processes are different across key types of procured goods & services due to different levels of human rights risks associated with different supply chains.

First of all, compliance with Thai Union's CoC or VCoC is required for all suppliers. After the launch of the CoC/VCoC, new suppliers must acknowledge and accept the Codes before supplying to Thai Union. Existing suppliers were requested to review and sign the Codes as well.

After the mandatory acknowledgement of the Codes, additional screening and audit policies vary across different categories of suppliers due in part to varying human rights risks. These policies are explained below.

### 7.1) Approval and Audit Policy for Seafood Raw Materials Sourced from Thailand

Thai Union conducts an additional approval process for all locally sourced seafood raw materials from Thai-flagged vessels to ensure no Illegal, Unreported and Unregulated (IUU) fishing and prevention of labor rights abuses. All suppliers must pass Thai Union's pre-appraisal to ensure compliance with applicable laws & regulations including those related to human and labor rights abuses. The pre-appraisal comprises a physical review of all documents and/or vessels at the suppliers' location. Required evidence for pre-appraisal includes, but is not limited to, the following:

- Commercial Fishing License
- Vessel License
- Vessel Audit Certificate
- Aggregator License (where applicable).

Thai Union can start purchasing raw materials from the suppliers only after they pass the pre-approval. Furthermore, all suppliers are subject to an internal audit by Thai Union within the first three months after the pre-approval. From then on, regular second-party and third-party audits are conducted on randomly selected vessels.

In addition to the audits, each purchase from the approved suppliers must come with additional documentation to ensure no IUU and the legal status of workers on board vessels. No raw materials will be used or payment of purchasing orders will occur until the suppliers submit the completed set of documents as follows:

- Marine Catch Purchasing Document / Marine Catch Transportation Document
- Vessel's Port-In, Port-Out certifications (where applicable)
- Fishing Log Book (where applicable).

In 2017-18, Thai Union conducted the first third-party social audit of Thai-flagged vessels in our supply chain. The aggregate results of the audits were published [here](#) for transparency and to help drive changes throughout the industry. Audit results have been used to put in place vessel improvement projects to raise the standard of suppliers to Thai Union. Further details about the vessel improvement programs can be found in the section below.

During October 2018 to July 2019, we conducted another round of third-party audits on 38 Thai-flagged fishing vessels from eight ports in our supply chain against the [Vessel Code of Conduct](#)

[\(VCoC\)](#). For transparency, the aggregate audit results were published in [our Annual 2019 Sustainability Report](#).

In 2020-21, due to COVID-19 related travel and visit restrictions, we had to develop and implement new ways of working. Amid the travel restriction, we could proceed with on-site audit trips briefly during August and November 2020.

Looking forward to 2022, we plan to resume the third-party social audit program for Thai-flagged vessels once related travel and visit restrictions are lifted.

## 7.2) Approval and Audit Policy for Internationally Sourced Seafood Raw Materials

Similar to the seafood raw materials sourced from Thailand, TU has policies and procedures in place to ensure traceability, that no fish enters the supply chains that are from vessels where illegal activity such as IUU fishing or human rights abuses happens. Before supplying to Thai Union, suppliers need to ensure that fishing vessels supplying tuna (whole round or processed in loins) are identified and in full compliance with IUU, ISSF, DG Sanco resolutions. The documentation is mandatory for ensuring the traceability of fish and bringing the evidence that no IUU fish is entering into the supply chain, EU CC being mandatory and giving full details of the boat itself and the capture.

In 2016-17, we commissioned consultants to conduct third party audits of the fleet supplying tuna to our European markets. The audit covered several different aspects of requirements that we have with our suppliers such as; compliance with regulations by the EU and the International Seafood Sustainability Foundation (ISSF), fishing licenses, quality and food safety, the TU sustainability policy and the Business Ethics and Labor Code of Conduct (CoC).

In 2018, we began a new third-party audit program of vessels that supply us with tuna against the [Vessel Code of Conduct \(VCoC\)](#). Since August 2018, audits have been conducted on over 140 tuna vessels in the Atlantic, Pacific and Indian Oceans. These vessels go to sea for varying lengths of time and use a range of gear types including trawl, purse seine, pole and line and long line. For transparency, the aggregate audit results were published in our [2020 Sustainability Report](#).

Since March 2020 when COVID-19 started to impact the ability to conduct on-site inspection, onsite audits have been conducted in Ghana and Mauritius, whilst remote auditing has continued with engagement on vessel and supplier corrective action plans and improvements.

## 7.3) Approval and Audit Policy for Other Food Ingredients, Packaging Materials, and Logistics Providers based in Thailand

For providers of food ingredients, packaging materials, and logistic services based in Thailand, all potential suppliers must complete a Self-Assessment Questionnaire (SAQ) on social compliance to evaluate their human and labor rights risks. The SAQ was developed based on Thai Union's Business Ethics and Labor Code of Conduct (CoC). Suppliers identified as "high risk" or "medium risk" based on the SAQ responses will receive independent third-party audits to verify their ability to comply with the CoC. Such suppliers will be exempted from the audits only if they have valid social standard certifications in place such as Sedex Members Ethical Trade Audit (SMETA), Amfori Business Social Compliance Initiative (BSCI), Social Accountability (SA 8000), or Thai Labor Standard (TLS 8001).

Suppliers that do not pass the audit have an opportunity to undergo a supplier performance improvement program, which helps suppliers develop their practices to meet Thai Union's social compliance requirements. Refusal to participate in the performance improvement program will lead to termination of the supplier in question.



For the 2020 audit programs, about 9% of the total number of suppliers were classified as “high risk” or “medium risk” and therefore received either third-party audits against our CoC or submitted qualified social standard certifications. In 2021, the percentage of high-risk or medium risk is 15%, with the increase from the previous year largely associated with an expanded scope as we look to include more suppliers for whom we want to closely monitor social performance.

#### 7.4) Special Oversight & Audit Policy for Shrimp Supply Chain in Thailand

While Thai Union co-owns a very small number of shrimp farms, the vast majority of our shrimp are sourced from supplier farms to help meet market demand for our products. We buy shrimp primarily from aggregators who in turn aggregate catches from their network of shrimp farmers.

In addition to processing shrimp, we also produce shrimp feed for our own shrimp farms and for sales. Shrimp feed contains fish meal from independent pre-approved producers. Fish meal is in turn produced from bycatch or other wild-caught fishes deemed unsuitable for human consumption or from tuna byproducts.

Thai Union identified early on perceived high risks of labor rights abuses in shrimp farms and on board vessels supplying fish for fish meal in our supply chain. In 2016, 100 percent of our shrimp feed supply chain was externally audited by UL, in collaboration with the Seafood Task Force. To reduce risks, in 2016 we vertically integrated all external pre-processing, bringing in house over 1,200 workers with the oversight of a local NGO partner to ensure all new staff had safe and legal labor. In addition, we began our own second-party social audit programs for the fishmeal plants and vessels supplying fish for the fishmeal. In 2019, about 33 percent of the vessels and 89 percent of the fishmeal plants in our supply chain were audited. In 2020-2021, we conducted additional audits of 27 vessels and 90 fishmeal plants in our fishmeal supply chain.

Recognizing sustainability challenges from using wild-caught sources of fish meal, in 2019 we released the first shrimp grown from feed that used an alternative protein Feedkind®, made from methane, to replace the Thai wild caught fishmeal component of shrimp feed. In 2020, Thai Union and Corbion – the global market leader in algae-based ingredients for feed – [announced the expanded adoption of AlgaPrime DHA](#), an omega-3 rich algae feed ingredient, in Thai Union shrimp feed following a successful large scale trial in 2019.

Further developments to replace all Thai fishmeal in shrimp feed continue, and include use of insects, algae and other alternate proteins.

In 2020-2021, we asked 60 Thai shrimp farmers in our supply chain to complete self-assessment. We are also implementing a program to strengthen human rights due diligence of our entire shrimp supply chain, consisting of supply chain mapping, auditing, engagement, and capacity building.

### 8) TRAINING AND CAPACITY BUILDING ON MODERN SLAVERY, HUMAN TRAFFICKING, AND HUMAN RIGHTS

We recognize that addressing modern slavery and human trafficking is an issue that we must take responsibility for and at the same time work collaboratively to tackle the challenge at scale. Together with our partner NGOs, regulators, intergovernmental agencies, and customers, we developed initiatives to improve awareness and knowledge of human rights within our own factories or across our supply chains. Training and capacity building activities form a core pillar under our Due Diligence Program to help prevent human rights violations in the first place. Our efforts to date include:

### 8.1) Training on the Business Ethics and Labor Code of Conduct for Thai Union employees

Following the launch of the Business Ethics and Labor Code of Conduct (CoC) in 2015, a staff training package was developed and delivered to executives, human resources and procurement staff in Thailand in December 2015. Furthermore, the CoC was incorporated in the mandatory orientation for incoming staff. To date, all monthly employees and new employees (for both monthly and daily employees) based in Thailand have received training on the CoC. Furthermore, in 2018 we completed CoC training for 100 percent of daily employees in Thailand, the majority of whom are migrant workers. After 2018, we ensure that all new daily employees receive CoC training by incorporating the CoC in orientation program for the new hires.

### 8.2) Pre-departure Training for Thai Union's Migrant Workers

As mentioned in the previous section, Thai Union rolled out an Ethical Migrant Recruitment Policy in 2016 to reduce the potential vulnerability of migrant workers to labor exploitation, including the worst forms of child labor and human trafficking. Under the policy, candidates who are offered positions will receive training by Thai Union and the Migrant Workers Rights Network (MWRN) on terms & conditions of employment, complaint mechanisms, and relevant laws for working and living in Thailand, prior to leaving their countries of origin. Thai Union is responsible for the cost of the training. Because of COVID-19 related travel restrictions and border closures, we were not able to recruit any new migrants through the regular process during the reporting period. Therefore, there was no pre-departure training conducted.

### 8.3) Suppliers Capacity Building

As described in the previous section, all contracted and prospective suppliers that wish to conduct business transactions with Thai Union must sign an acknowledgement of the Business Ethics and Labor Code of Conduct (CoC) or Vessel Code of Conduct (VCoC) (for fishing vessels), whereby they accept to strictly follow our mandatory principles and policies for human trafficking and forced labor. Following the launch of the Codes, Thai Union established various supplier capacity building programs to ensure that suppliers understand and can comply with the Codes. The program creates awareness of the Codes and addresses any emerging and ongoing social compliance issues. Capacity Building programs for different types of suppliers are as follows:

#### 8.3.1) Food Ingredients, Packaging Materials, and Logistics Providers based in Thailand

Since 2016, we organized training on the CoC for Thailand-based suppliers of food ingredients, packaging materials, and logistics. The training program takes place annually to target new or high-risk suppliers. In 2020-21, we provided virtual training to 16 new suppliers. For the rest of the suppliers, we provided an online curriculum via our recently launched Social Performance Platform, where suppliers can study and learn about our Code online at their own pace.

#### 8.3.2) Fishing vessels

In 2017, we provided an update on expectations for labor compliance and auditing to all of our international tuna suppliers through two workshops, held in Bangkok and Paris. In 2018-19, we began to implement the [Vessel Improvement Program \(VIP\)](#) to raise suppliers' capacity to meet our VCoC standards. We rolled out [new Capacity Building for Fisher Safety at Sea program](#) for vessel operators in our supply chain, in collaboration with the ILO and International Transport Workers' Federation (ITF). To date, we have held four workshops in the provinces of Pattani, Ranong, Rayong, and Chumphon, with about 300 participants who are fishers in our supply chain. Participants received a range of guidance, including first aid and basic medical training techniques such as CPR, and how to effectively respond to a potential life-threatening situation while at sea. Each fisher also received a medical kit containing supplies to use while on board vessels. In 2020-

2021, the health and safety training was put on hold due to COVID-19 related travel and visit restrictions however, we were able to review the content with our partners and extend the program to include more aspects of working at sea such as fishers rights.

Furthermore, in 2020 we started the development work to establish project to increase vessel crews' understanding of their employment contract in partnership with Creative Contracts. They specialise in 'comic contracts' which uses pictures and graphics in the contracts to make the information more accessible. We are in a process of setting up the pilots to test the draft comic contract with selected suppliers in Thailand.

### 8.3.3) Aquaculture farms

Thai Union's work with the Seafood Task Force, as well as the Southeast Asian Shrimp Aquaculture Improvement Protocol (SEASAIP), Best Aquaculture Practice (BAP) and Aquaculture Stewardship Council (ASC) all forms part of our journey towards sustainable aquaculture.

In 2018, we provided training on our Business Ethics and Labor Code of Conduct (CoC) for shrimp aggregators in our supply chain. We also have an ongoing project to raise the capacity of selected shrimp farms in achieving ASC or BAP certifications which address environmental and social responsibility, animal welfare, food safety, and traceability. In 2019, 97 shrimp farms in our program received either ASC or BAP certifications. In 2020-2021, an additional 7 farms in the program were certified.

In 2019, Thai Union, our Chicken of the Sea® brand, and Monterey Bay Aquarium launched [SeaChange@ Ignite](#), a collaboration to advance new sustainability initiatives and improvements throughout the supply chain. The combined commitment for the initiative is USD \$73 million through 2025, with a focus on improvements in Southeast Asia and other key seafood producing regions. As part of the collaboration, we will work with the Monterey Bay Aquarium and the Asian Seafood Improvement Collaborative (ASIC) to improve the sustainability of farmed shrimp in Thailand and Vietnam. The project will focus on both social and environmental aspects of sustainability, including the issues of labor conditions on farms.

Further details of Thai Union's work in our aquaculture supply chain can be found in this [video](#).

### 8.3.4) Labor recruitment agencies

Across 2018-21, we continued to focus on strengthening the implementation of our Ethical Migrant Recruitment Policy together with our NGO partners and recruitment agents in our supply chain. In 2018-19, we conducted a refresher and informational training for the agents and their sub-agents on the topics of Thai Union's Business Ethics and Labor Code of Conduct (CoC), Ethical Migrant Recruitment Policy, a new standard for workers' dormitories, and roles and responsibilities of agents. As a follow up, in 2019 the agents completed Self-Assessment Questionnaire (SAQ). Our second-party audit of the agents were expected to take place in 2020, but was suspended due to COVID-19 related travel restriction.

Finally, at the invitation of the Seafood Task Force, the recruitment agencies in our supply chain recently began to participate in a capacity building program by the Fair Hiring Initiative (FHI) in order to raise their standards towards On The Level (OTL) core principles and Standards of Ethical Recruitment. Full assessment of the agents' practices against the OTL standards were completed in 2020.

## 9) OTHER ACTIVITIES RELATED TO HUMAN RIGHTS

### 9.1) Policies and Measures to Protect Health and Safety of Employees from COVID-19

During the period covered by this Statement, we continue to put in place strict monitoring systems and preventive measures globally to ensure that our employees are safe and healthy amid the COVID-19 pandemic. Each region where Thai Union operates activated their Crisis Management Team (CMT), which meet regularly and communicate with the global CMT to put in place action plans and execute them, as well as report on production and other key measurements. Regional CMTs are also responsible for keeping up to date with local government requirement and regulations and complying with them. These policies include:

- Guidelines on restricted business travel to lower risk of infection;
- Site separation policies to lower risk of cross-contamination across Thai Union work sites;
- Work from home guidelines to lower the risk of infection at workplaces and to help employees work productively and maintain work-life balance in a home office setting;
- Strict worker testing and contact tracing regimes;
- Steps to be taken in the event of suspected cases among our workforce.

We also promote hygiene and sanitation practices at workplaces, workers' transportations, and workers' dormitories, such as:

- 1) Providing free reusable face masks or face shields;
- 2) Providing handwashing and alcohol gel stations in various locations of our facilities;
- 3) Educating workers on general awareness of COVID-19 through workplace posters, audio/video recordings in workers' own languages. Educational materials were also shared with our migrant labor recruitment agents and partner NGOs who can help disseminate knowledge to workers in their network;
- 4) Practicing social distancing within the facilities, where we can, such as keeping a distance of 1.5-2 meters between people in canteen or waiting areas during lunch time, installing partitions between desks or dining table sets, or staggering break times to avoid overcrowding in rest areas;
- 5) Practicing social distancing in workers' transportation by increasing the number and frequency of transportation vehicles between dormitories and the factories to reduce the number of passengers per trip;
- 6) Promoting social distancing and hygiene practices in workers' shared dormitories, in collaboration with their owners, such as applying disinfectant sprays on a regular basis at the dormitories or disseminating educational videos on hygiene practices in shared rooms.
- 7) Facilitating and promoting workers' access to COVID-19 vaccines through governments' schemes or Thai Union's privately procured vaccines.

Finally, we also provided financial and in-kind donations to NGOs, local hospitals, and relevant government authorities for COVID-19 in line with our commitment to supporting people and communities where we operate. As of August 2021, we donated more than 3.3 million servings of food globally to support communities since the onset of COVID-19.

### 9.2) Promoting Children's Right to Education through Preschools

In Thailand, many migrant workers' children have limited access to education due to language barriers and insufficient knowledge about the Thai school system. In November 2020, we officially



opened our [fifth preschool at Wat Samakee Satharam School in Samut Sakhon](#), which will help prepare the children of migrant workers for the Thai education system and achieves the company goal of establishing five such preschools by 2020 in collaboration with the Labor Promotion Network (LPN). The schools help the children enter into the Thai education system so they can progress to primary schools. By encouraging school attendance, the preschool program also ensures safety of children during the day and discourages child labor.

### 9.3) Electronic Monitoring of Fishing Vessels

Since 2018, Thai Union has been working with The Nature Conservancy (TNC) to install Electronic Monitoring (EM) on board vessels in our tuna supply chain. The EM will be able to help detect illegal fishing and human rights abuses aboard the vessels, by ensuring that they are under comprehensive observation at all times.

In March 2021, we [announced a new partnership](#) with TNC to scale up EM installations with the goal of implementing 100% 'on-the-water' monitoring of our vast tuna supply chain by 2025. This work includes deploying EM on all of the partner vessels in our supply chains –including onboard video cameras, GPS, and sensors to automatically track activities onboard--and/or human observers.

This statement was reviewed by the Thai Union Board of Directors and authorized by the Chief Executive Officer and Executive Chairman. The Statement will be reviewed annually and published on the Thai Union website.

A handwritten signature in black ink, appearing to read "Cheng Niruttinanon".

Cheng Niruttinanon  
Executive Chairman  
Thai Union Group PCL

Date of Issue: 23 February 2022

A handwritten signature in black ink, appearing to read "Thiraphong Chansiri".

Thiraphong Chansiri  
CEO and President  
Thai Union Group PCL