

UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2022

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 in 2022. In this Statement, we highlight key policies and initiatives that were established prior to 2022 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:

- Beginning to implement the third, and most current version of the [Ethical Migrant Recruitment Policy](#), which incorporates the full “Employer Pays Principle.” Starting in January 2022, Thai Union bears all recruitment-related fees and costs for all migrant workers in our Thailand-based facilities, applicable to all new recruitment activities initiated by the Company;
- Continuing to promote and strengthen internal worker voice mechanisms in our key processing facilities in Thailand through the *Tell Us Project*. In 2022, we conducted two pilot training sessions covering 165 Thai Union staff from the factory management teams, Human Resources teams, Employee Relations teams, workers’ direct supervisors team, and the Worker Welfare Committee (WWC);
- Piloted training modules to support the well-being of parents-workers and children’s rights in our Thailand-based facilities. The training was delivered by a local child and adolescent psychiatry expert for Thai workers and The Centre for Child Rights and Business (CCR) for Burmese workers. The goals are to build capacities among parents-workers who live apart from their children on remote parenting skills, effective communications with children, and dealing with stress, etc.;
- Issuing the second update of the [VCoC version 2.0](#) and the corresponding [Guidance Document](#). This update included the ethical recruitment extension which has been developed through a further understanding of the recruitment journey of fishing crews;
- Conducting the first social audits at sea. This [blog](#) outlines the project. The at-sea audits focused on the health and safety of the crew and general working conditions on board the vessels. The auditor was placed on board a carrier vessel and audited vessels during transshipments;
- Publishing aggregate results of the third-party social audit of fishing vessels in our supply chain against the VCoC in the [2021 Annual Sustainability Report](#);
- Continuing to conduct VCoC and Health & Safety Training for fishers on Thai vessels in our supply chain, in collaboration with The International Transport Workers Federation (ITF). In 2022, a total of 9 training sessions were conducted for more than 690 fishers across almost 60 vessels;



- [Distributing more than 500 medical kits](#) to Thai fishing vessels in Thai Union's supply chain and to ITF to ensure that fishers in the supply chain have immediate access to basic medicines, a requirement under the VCoC. A proportion of the kits were provided to ITF to support fishers' health and safety in the wider fishing community;
- 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 one ranking globally in the Food Products Industry Index of the [Dow Jones Sustainability Indices \(DJSI\)](#), with industry best-in-class 100th percentile rankings in a number of areas including those related to human and labor rights such as Supply Chain Management, Social Reporting, Human Rights, Living Wage, and Occupational Health & Safety.

1) ABOUT THAI UNION

Thai Union Group PCL is the world's seafood leader, bringing high quality, healthy, tasty and innovative seafood products to customers across the world for 46 years.

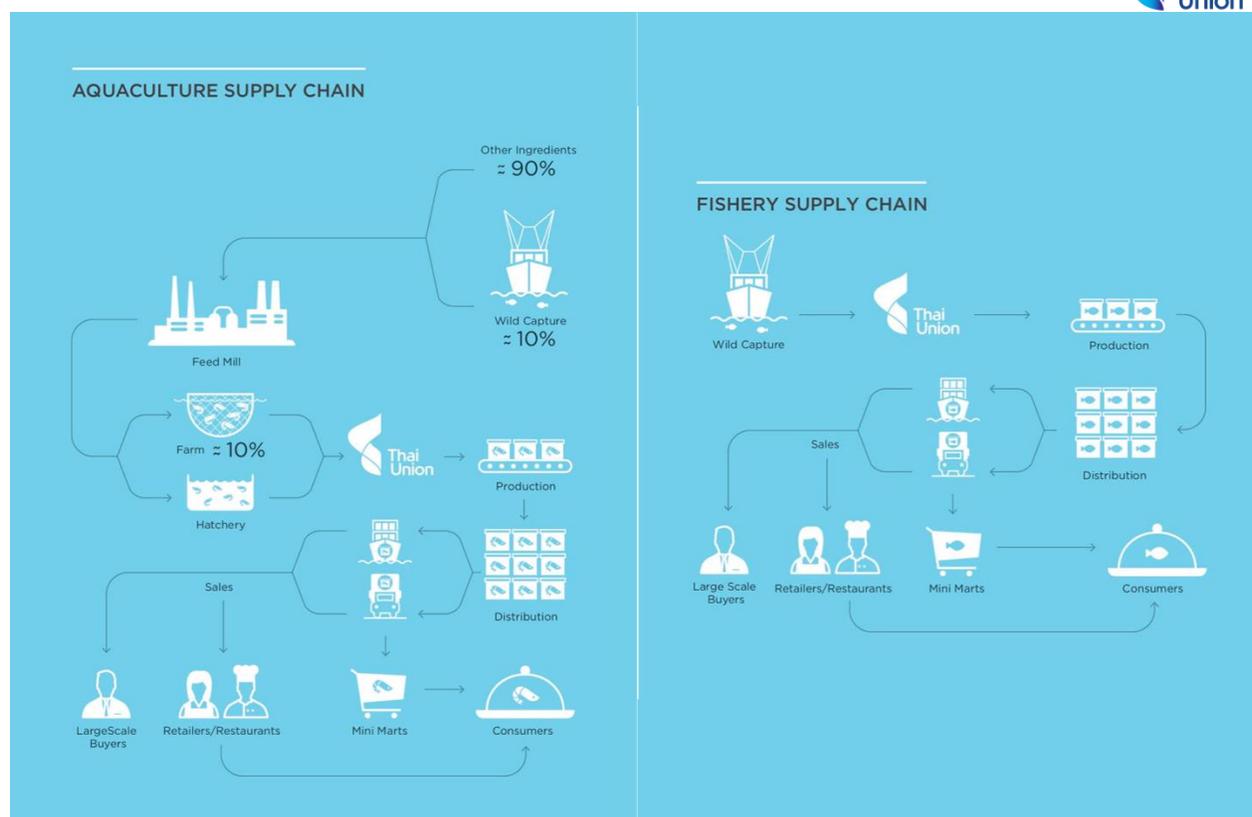
Today, Thai Union is regarded as one of the world's leading seafood producers and is one of the largest producers of shelf-stable tuna products with annual sales exceeding THB 155.6 billion (US\$ 4.4 billion) and a global workforce of more than 44,000 people who are dedicated to pioneering sustainable, 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, Hawesta, and Rügen Fisch, Thai-leading brands SEALECT, Fisho, Qfresh, Monori, OMG Meat, Bellotta and Marvo, and ingredient and supplement brands UniQ®BONE, UniQ®DHA and ZEAvida.

As a company committed to "Healthy Living, Healthy Oceans," Thai Union is proud to be a member of the United Nations Global Compact, a founding participating company of the International Seafood Sustainability Foundation (ISSF), and current Chair of Seafood Business for Ocean Stewardship (SeaBOS). Thai Union's ongoing work through its SeaChange® sustainability strategy was recognized when the company was listed on the Dow Jones Sustainability Indices (DJSI) for the ninth consecutive year in 2022. The company was ranked number one on the Food Products Industry Index of the DJSI, a position it previously held in 2018 and 2019. Thai Union was also named to the FTSE4Good Emerging Index for the sixth straight year in 2021. Find out more about the Group's sustainability at seachangesustainability.org.

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 species in Thai Union products.

Thai Union has 14 production locations in 12 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](#).



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 the information published details where wild-caught and farmed seafood Thai Union purchases for use in its products is sourced from; this was first completed in 2021.

In 2022, Thai Union [entered into a partnership with Sustainable Fisheries Partnership \(SFP\)](#) to further improve transparency in the Company's supply chains and consider wider impacts on biodiversity. The partnership with SFP will also allow Thai Union to continue and deepen its participation in the ODP (which SFP manages), with sustainability information to be made publicly available through the platform. SFP's Seafood Metrics will allow Thai Union to continue to improve the monitoring, transparency and traceability of its supply chains, as well as assess and monitor its global wild and farmed supply chains used in its businesses in the EU, U.S. and Asia. Seafood Metrics aggregates and tracks information on governance quality, target stock health, human rights risks, and environmental impacts in a company's source fisheries. Additional sustainability indicators, such as certifications, Human Rights Risk Assessment, NGO ratings and traceability will be included in the monitoring.

In addition to seafood raw materials, Thai Union also sources 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.



OUR OVERARCHING OBJECTIVES

- Sustainable seas**, now and for future generations
- Workers are safe, legally employed and **empowered**
- Combating climate change** and promoting healthy diets through sustainable seafood

OUR PROGRAMS

- Safe & Legal Labor**
Providing safe, legal and freely-chosen employment in our own facilities and in supply chains is critically important to Thai Union.
Safe and Legal Labor Roadmap
- Responsible Sourcing**
Traceability is the key to improving the transparency and operational practices of the entire seafood supply chain.
Responsible Sourcing Goals and Roadmap
- Responsible Operations**
The way we operate must be environmentally responsible and show a duty of care for our workers.
Responsible Operations Goals and Roadmap
- People & Communities**
At Thai Union we take responsibility for improving the lives of those living and working in the regions in which we operate.
People and Communities Goals and Roadmap

SeaChange® is an integrated plan of initiatives, organized into four programs, to drive meaningful improvements across the entire global seafood industry

OUR OPERATING PRINCIPLES

- Good Governance**
Robust leadership, policies and processes ensure our business is focused on delivering our sustainability objectives and is ethical across all our operations.
- Transparency**
We will remain transparent in all communications with stakeholders, customers and the industry, sharing our learnings and providing regular updates on our progress.
- Partnerships and Collaboration**
We have and will continue to actively seek out NGOs, governments and industry partners to work with us on initiatives designed to deliver against our overarching objectives. We will continue to share our findings so the entire industry can benefit from our experience and findings.

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.

In 2023, we will announce a revision to the global sustainability strategy, SeaChange®, which will include new goals and new commitments.

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 SDG 2 (“Zero Hunger”), SDG 8 (“Decent Work and Economic Growth”), SDG 13 (“Climate Action”), and SDG 14 (“Life below Water”). More specifically, achievements under the “Safe & Legal Labor” pillar will contribute to SDG 8.7 to end modern slavery.

3.2) WORKING IN PARTNERSHIP AND COLLABORATION

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 an 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 participating company of the ISSF, whose objective is to improve the sustainability of tuna.
- [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 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. In 2022, Thai Union Group CEO Thiraphong Chansiri was appointed Chair of the Board of Directors of SeaBOS.
- [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 Ltd.) conducted an [independent audit](#) of 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.

We also collaborate 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 2022, we were ranked number one in the world in the food industry on [the Dow Jones Sustainability Indices \(DJSI\)](#), further validating the progress made under our global sustainability strategy, SeaChange®. Thai Union has now been listed for nine consecutive years on the DJSI, a family of indices evaluating the sustainability performance of thousands of publicly traded companies. The Company was ranked

number one on the Food Products Industry Index of the DJSI, a position it previously held in 2018 and 2019.

- In 2022, 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 awards were given to those organizations that operate according to the Human Rights principle and for outstanding performance in contributing to Human Rights that impact all stakeholders across all dimensions, including being a role model for others in strengthening society in respecting Human Rights.
- We received the Thaipat Institute Sustainability Disclosure Award in recognition of the Company's disclosure of its Environmental, Social and Governance (ESG) performances as well as its outstanding efforts towards achieving UN Sustainable Development Goals (SDGs) target 12.6, encouraging companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.
- In 2022, for the seventh 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.
- In early 2023, we were invited by the Indonesian and Australian Governments to share our best practices to eradicate modern slavery from our supply chain to the World's Governments, as part of our participation in [the Bali Process Government and Business Forum](#).

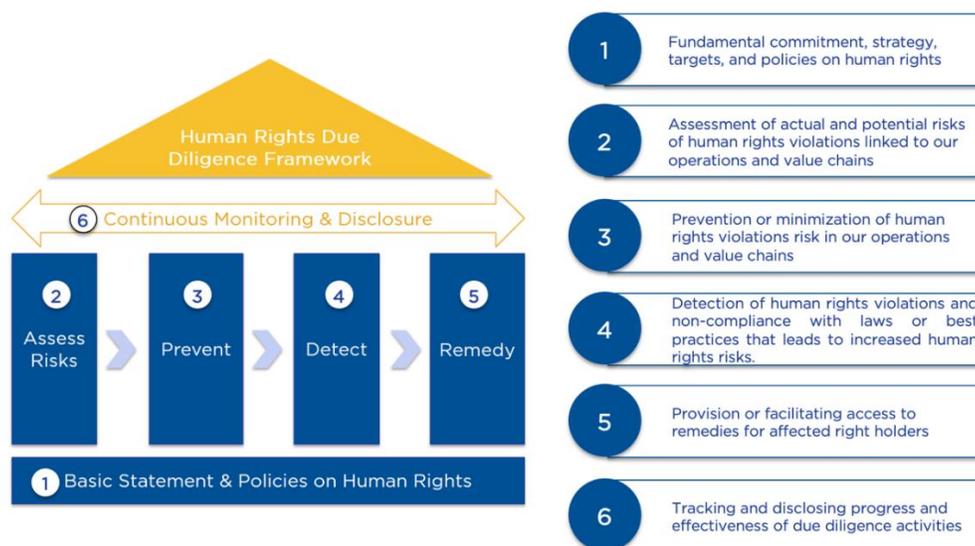
The latest list of awards and recognitions can be found on the SeaChange® webpage [here](#).

4) HUMAN RIGHTS RISK ASSESSMENT

Some areas of the seafood industry are described as being generally labor intensive and with a complex supply chain with many stakeholder groups involved. Similar to other industries are 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 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 by independent experts to help identify and visualize potential human rights risks in **fisheries** that Thai Union sources from. 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, two separate desk-based research was conducted 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 2020-21, the desk-based research on human rights risk was repeated at a country level using a similar methodology to the previous exercise in 2018-19 but with more



updated data sources. In addition, the social audit results of fishing vessels were reviewed. The audits were conducted by independent consultants against the Thai Union [Vessel Code of Conduct \(VCoC\)](#) and allowed for a more granular understanding of human rights risks related to fishing vessels. Furthermore, an independent human rights expert was commissioned 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, a special desk-based human rights risk assessment was conducted focusing on the potential impact on the rights of indigenous people from our operations and supply chain.

Most recently, in 2022 we updated our human rights risk assessments, once again drawing on the most recent publicly available information sources as well as social audit findings.

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 provides 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 a 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 the 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 issued the third update to the [Ethical Migrant Recruitment Policy](#), to reflect the "Employer Pays Principle" (EPP) for all recruitment of migrant workers for our Thailand-based operations, starting from January 1, 2022. Under the EPP, 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. In 2022, a total of 3,730 new workers were recruited under the new Policy.

In 2023, we will continue to implement the EPP under our existing Ethical Migrant Recruitment Policy and work with our CSO partner to strengthen oversight of in-country migrant recruitment.

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 a 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, Thai Union published the 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 fishing operations and conditions at sea. The intention of this is that its implementation will provide guidance to the fishing vessels that Thai Union sources from and improves 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, the U.S., Asia and others. Thai Union's expectation is that all of the fishing vessels that the Company buys from are from suppliers that are continuously improving in their efforts to meet the clauses in the Thai Union VCoC and that this is monitored. Thai Union aims to work with 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 Thai Union published the [Guidance to the TU 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. The guidance document also aims to align auditors and independent consultants for the implementation of the program. Subsequently in 2020, Thai Union 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.

Finally, in 2022, Thai Union issued the second update of the [VCoC version 2.0](#) and the corresponding [Guidance Document. This update included the ethical recruitment](#)

[extension which has been developed through further understanding of the recruitment journey of crews.](#)

Thai Union worked with consultants to extend the VCoC to be able to conduct recruitment mapping exercises of our suppliers similar to what had been done in the Thai factories. 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 8.3.2.

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, a robust vessel-to-processor traceability system has been implemented 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

Thai Union's 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](#). S
- [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. E
- [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). This confidential email is applicable for all Thai Union sites, offices, and suppliers globally. C
- [Internal hotlines](#) – Thai Union employees can call site-specific hotlines to seek help, request consultation on employee relation issues or report grievances anonymously. I
- [Suggestion boxes](#) – Each Thai Union factory in Thailand provides a suggestion box for workers to anonymously report grievances. S
- [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. H
- [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 W

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. Since 2016, we have worked with an NGO partner 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](#).

• [GO partners' physical outreach, independent helplines, smartphone app, and social media platform](#) - In addition to internal grievance and worker voice mechanisms, workers at our facilities are provided with access to NGO partners' hotlines, provided free of charge and available in workers' native languages to accommodate migrant workers. Employees 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. We have actively addressed key issues uncovered through this grievance channel. We will continue to partner with NGO partners 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 [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.

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](#).

Finally in 2022, we conducted two pilot training sessions covering 165 Thai Union staff from the factory management teams, Human Resources teams, Employee Relations teams, Workers' Line Supervisors and Managers team, and Worker Welfare Committee (WWC) members. The training's objectives are:

- To strengthen the WWC through developing a more comprehensive understanding of grievance and WWC roles and responsibilities among its management and worker members;
- To provide Thai Union management and worker representatives with knowledge and practical skills that will enable them to fulfill their roles more effectively;
- To support Thai Union's capacity in implementing its grievance mechanism by providing a common, in-depth understanding of key concepts, policy, and procedures among its relevant actors.

In 2023, a focus will be to scale up the pilot training to cover 100 percent of relevant employee target groups and start to operationalize the Worker Voice KPIs to measure the effectiveness of our internal worker voice mechanisms.

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. New suppliers must acknowledge and accept the Codes before they begin 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:

- | | | |
|---|--|---|
| • | | |
| • | arine Catch Purchasing Document / Marine Catch Transportation Document | M |
| • | essel's Port-In, Port-Out certifications (where applicable) | V |
| • | ishing Log Book (where applicable). | F |



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 restrictions, we could proceed with on-site audit trips briefly during August and November 2020.

Looking forward to 2023, third-party audits will continue for Thai-flagged vessels.

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

Similar to the seafood raw materials sourced from Thailand, Thai Union 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, Thai Union commissioned third party audits be conducted of the fleet supplying tuna to European markets. The audits covered several different aspects of requirements that we have with our suppliers such as; compliance with regulations by the EU and the ISSF, fishing licenses, quality and food safety, the Thai Union sustainability policy and the Business Ethics and Labor CoC.

In 2018, Thai Union began a new third-party audit program of vessels against the [VCoC with a focus on the tuna vessels involved in Fishery Improvement Projects](#). Since August 2018, audits have been conducted on 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 [2021 Sustainability Report](#).

To further mature the program, in 2022 Thai Union contracted MRAG Ltd. consultants to conduct the first social audits at sea. This [blog](#) outlines the project. The at-sea audits focused on health and safety and general working conditions on board the vessels. The auditor was placed on board a carrier vessel and audited vessels during transshipments.

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 2022 audit programs, about 12 percent 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.

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

While Thai Union owns or 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 2022, we conducted additional second-party audits of 12 vessels 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 2022, we completed second-party social assessment of 25 Thai shrimp farms in our supply chain. 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, in collaboration with the Seafood Task Force.

In 2023, we will announce a revision to the global sustainability strategy, SeaChange®, which includes new goals and new commitments. Under the new strategy, our shrimp supply chain will be a key focal point for both social and environmental aspects.

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. The Ethical Migrant Recruitment Policy was subsequently updated in 2022 to reflect the Employer Pays Principle.

Under the policy, candidates who are offered positions will receive training by Thai Union and NGO partners 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. In 2022, a total of 22 pre-departure training sessions were 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 have been organizing training on our Business Ethics and Labor Code of Conduct (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 2022, a virtual training was conducted for six new suppliers. To support continuous learning, we also created online Social Performance Platform, where all of the suppliers can access to learn about our CoC at their own pace.

8.3.2) Fishing vessels

In 2017, an update on expectations for labor compliance and auditing to all international tuna suppliers was provided through two workshops, held in Bangkok and Paris. In 2018-19, the [Vessel Improvement Program \(VIP\)](#) began to raise suppliers' capacity to meet our VCoC. 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, workshops have been held in the provinces of Pattani, Ranong, Rayong, and Chumphon, with about 300 participants who are fishers on vessels that Thai Union sources from. 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, the content was reviewed with our partners and the program was extended to include more aspects of working at sea such as fishers rights. In 2022, the training was resumed. A total of 9 training sessions were conducted for more than 690 fishers across almost 60 vessels.

Furthermore, in 2020 work was developed to establish a 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. In 2022, we completed pilots testing draft comic contracts with selected suppliers in Thailand.

Since 2018, each year aggregated audit and vessel improvement results are analyzed to set priorities for the next year. In 2021 and 2022, the priority vessel audits and improvement plan engagement was focused on participants/suppliers within the fisheries

involved in projects to achieve MSC (FIPs). By the end of 2022, all of the suppliers within the FIPs had either completed their VIP to meet the Thai Union VCoC or had created their improvement plans and/or they had begun the process of considering establishing their VIP. As previously mentioned, the VCoC covers aspects related to preventing and eliminating modern slavery and human trafficking, and improving workers understanding of their human rights and making sure that suppliers are doing the right actions to ensure the same.

To encourage improvement actions, each supplier developed their improvement action plans to be implemented across their entire fleets and verification checks were conducted on a sample basis for compliance purposes. External consultants are contracted to review and assess the evidence against the root cause analysis which confirmed that the actions taken by the vessel owners were sufficient in closing the finding.

Regular bilateral meetings with suppliers/vessel owners were held for increased engagement and discussion for any issues and barriers for the implementation of improvements. These meetings included training on each of the core principles of the Thai Union VCoC and how to complete an effective VIP.

Further program development has taken place in Ghana where an in-country consultant worked directly with the vessel owners to implement their corrective actions. The in-country consultant collected first-hand evidence to report back to Thai Union and the external consultants. Similarly, in Mauritius, further engagement from the vessel owner has enabled wider improvement projects to be developed such as clock in and clock out systems for the crew members to better understand working times. Other suppliers implemented crew and captain handbooks with all relevant information regarding working conditions and their responsibilities.

In 2023, the priority will be to audit the suppliers who are participating in other FIPs that have not yet been included, continue VIPs that are not yet completed and continue to expand the work involving recruitment agencies of suppliers.

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.

Since 2018, we have an ongoing project to sponsor and raise capacity of selected shrimp farms to achieve ASC or BAP certifications which address environmental and social responsibility, animal welfare, food safety, and traceability. In 2022, a total of 83 shrimp farms either owned or sponsored by Thai Union received BAP certification. A total of 8 farms either owned or sponsored by Thai Union received ASC certifications.

8.3.4) Labor recruitment agencies

Across 2018-22, 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).

Finally, at the invitation of the Seafood Task Force, the recruitment agencies in our supply chain participated 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 initial assessment of the agents' practices against the OTL standards were completed in 2020. In 2022, two recruitment agencies in our supply chain completed third-party audits against the OTL standards. In addition, a third-party survey was conducted on a sample of workers to validate agencies' ethical performance.

9) OTHER ACTIVITIES RELATED TO HUMAN RIGHTS

9.1) 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 Sattharam 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.

In 2022, 297 migrant children entered to the preschools. Thai Union continues to provide education programs to increase knowledge and experience in other areas for students and teachers in these schools every year. For example, we arranged a design thinking online workshop for teachers to develop their critical thinking and enhance their creativity. 90 percent of teachers can apply the idea and technique of design thinking process into their classroom. We also conducted the School of Sustenance Program with the Scholars of Sustenance Foundation to raise awareness and provide knowledge about food waste and nutrition at Wat Sri Suttharam School and Wat Yai Chom Prasart School. Students and teachers learned how to manage food waste in the school canteens including composting. Also, during COVID-19, we provided Antigen Test Kits to the schools and rice to support the school lunch.

9.2) Electronic Monitoring of Fishing Vessels

Since 2018, Thai Union has been working with The Nature Conservancy (TNC) to increase the number of vessels with Electronic Monitoring (EM) on board. EM supports the vessels to demonstrate that they are fishing legally, the composition of the catch and monitor workers at sea.

The TNC [partnership](#) was announced in March 2021 with the goal of implementing 100 percent 'on-the-water' EM or human observer coverage for tuna vessels that Thai Union



sources from 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: 3 May 2023

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

Thiraphong Chansiri
President & CEO
Thai Union Group PCL