



Thai Union Group:

Ethical Recruitment Guideline - Thailand

Issued and Verified by:

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

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Approved by:

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Public	
Guideline	
Ethical Recruitment Guideline	Date: 1 st March 2024 Version: 004/2024
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<p>Thai Union Group is committed to conducting business with integrity, openness, and respect for universal human rights. These are expressed in the International Bill of Human Rights and the principles concerning fundamental rights, set out in the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. We do not tolerate child labor, human trafficking and any forms of forced labor.</p> <p>The Company promotes equal opportunities; non-discrimination standards on the basis of caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, or pregnancy and seeks to ensure consistent practices throughout Thai Union and its subsidiaries.</p> <p>Our recruitment and hiring processes must meet our obligations under the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights, and our own Business Ethics and Labor Code of Conduct. With appropriate operational controls in place, we can ensure workers are hired with practices that comply with the law and conform to international standards on discrimination, any forms of forced labor (debt-bondage, indentured and prison labor), child labor (younger than the legal minimum age), human trafficking and other social responsibility risks.</p> <p>Effective March 1, 2024, this version of Thai Union’s Ethical Recruitment Guideline supersedes those released in April 2016 and updated in January 2021 and 2022.</p> <p>Objectives</p> <p>The objective of this guideline is to provide a set of principles to ensure that recruitment and hiring are managed consistently, professionally, fairly and transparently. The guideline aims to ensure the safe migration and reduce the potential vulnerability of both local and foreign workers to labor exploitation, including the worst forms of child labor and human trafficking, and that the integrity of Thai Union is upheld. This guideline is designed to align with international standards, specifically reflecting the Dhaka Principles for Migration with Dignity and the Employer Pays Principle, as well as the ILO General Principles and Operational Guidelines for Fair Recruitment. The overarching goal is to ensure that no worker bears the financial burden of securing employment.</p>	



Scope

This guideline, as applicable to local and foreign workers and jobseekers, delineates the entirety of the recruitment and hiring processes undertaken by Thai Union and its subsidiaries in Thailand.

It encompasses all aspects, from the commencement of Open Job Announcements to the conclusion of Onboarding procedures, for both local and migrant workers who are directly hired by Thai Union.

Migrant Labor & Supplier Approval Process

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

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

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

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

The selected/approved suppliers should disclose and continue to share as updated or adjusted all charges and terms of business to Thai Union and its subsidiaries, ensuring transparency about the costs, i.e. costs associated with documentation and the recruitment service fees, and must have in place a policy and procedure to ensure that their staff or subagents do not charge workers any additional fees beyond those agreed by Thai Union and its subsidiaries.

The selected/approved suppliers must also conduct due diligence monitoring of any subagents utilized to ensure their overall compliance with Thai Union's Supplier Code of Conduct, this Ethical Recruitment Guideline, and the Service Level Agreement with Thai Union.

Procedures for Recruiting Workers

- Thai Union or its relevant subsidiaries inform the approved recruitment agency of the job-related information, general conditions of work and remuneration as well as specific recruitment fees and related costs to be responsible by Thai Union or its subsidiaries. Then the recruitment agency clearly informs the jobseekers.

- The recruitment agency interviews the applicants for pre-selection according to advised and agreed upon recruitment criteria or other requirements determined by Thai Union or its subsidiaries.
- Pre-selected candidates' applications are filed and skill-tested and then short-listed.
- The applications of short-listed candidates are shown to Thai Union or its relevant subsidiaries for final selection.
- Recruitment agencies must ensure that selected workers are informed in their own language (or a language understood by the worker, consistent across all applicable languages used) and clearly understand and freely accept the terms and conditions of employment prior to recruitment. The selected candidates are shown and asked to sign the employment contract.
- Workers must be provided with copies of all relevant employment contracts in all applicable languages.
- Pre-departure training will be provided to the successful candidates. The training will cover the terms and conditions of employment, repatriation, culture, safety, complaint mechanisms, relevant laws for working and living in Thailand, etc.
- Thai Union or its relevant subsidiaries, and the approved recruitment agencies, shall coordinate with immigration and other authorities concerned to ensure that applicants who have been selected by employers have fulfilled the following requirements:
 - Visas or other forms of entry or departure permission
 - Work permits or origin country labor cards
 - Health Certificate, Insurances, and any health services
 - Any other required regulation for the work permit
- Clear guidelines for Document Retention will be established for the submission of workers' documents to the recruitment agency or Thai Union or its relevant subsidiaries temporarily, for instance, during visa processing.

Walk-in jobseekers applying for employment opportunities at Thai Union premises, in relation to job opening announcements:

- Thai Union or its relevant subsidiaries clearly inform the applicants about the job information, general conditions of work and remuneration as well as specific recruitment fees and related costs to be responsible by Thai Union or its subsidiaries.
- Thai Union or its relevant subsidiaries interview and select the applicants for employment according to recruitment criteria.
- The selected workers are informed in their own language (or a language understood by the workers, consistent across all applicable languages used) and clearly understand and freely accept the terms and conditions of employment prior to recruitment. The selected candidates are shown and asked to sign the employment contract.

- The workers must be provided with copies of all relevant employment contracts in all applicable languages.

Recruitment Fees and Related Costs

The terms 'recruitment fees' or 'related costs' refer to any fees or costs incurred in the recruitment process for workers to secure employment or placement, in accordance with the ILO General Principles and Operational Guidelines for Fair Recruitment and the Definition of Recruitment Fees and Related Costs. Thai Union or its relevant subsidiaries are considered to pay under the following definitions for jobseekers, new workers, and recruitment of existing workers based on the renewed employment process.

Thai Union or its relevant subsidiaries will communicate to jobseekers, workers, recruitment agents, and related parties about the types and amount of recruitment-related fees and costs covered by the company. Jobseekers will be informed in the early stages of recruitment.

Recruitment Fees and Related Costs

- All recruitment fees which are payments for recruitment services offered by labor recruiters, in matching offers of, and applications for, employment, including the following:
 - Contract development or contract signing ceremony costs;
 - Recommendation or approval documents

Accommodation and Travelling Costs

The travel cost will be developed and regularly updated, taking into account a reasonable average cost that considers both the distance traveled and the availability of public transportation options.

Overseas Recruitment

- Travelling costs from the place of current residence to interview site.
- Travelling and food costs for travelling to and from interview site, hospital (for medical check-up), passport processing facility, pre-departure training venue, contract signing ceremony venue, and to agreed departure point to Thailand.
- Accommodation costs during pre-interview, interview, passport processing and contract signing.
- Accommodation and food during assigned training dates.
- Travelling and food costs to and from origin country appointed departure point (e.g. Myawaddy); to Thailand border and Thai Union or its subsidiary's factories.

Local Recruitment

- Travelling costs from the place of current residence to the interview site and contract signing venue.

Personal Documents for legalizing workers' employment contracts

- Passport application fees including passport, photo, and forms
- Labor card or origin country required documents
- Visa costs and visa renewal
- Work permit documents and the renewal fees for initial and every employment extension required by law, including:
 - Work permit fee
 - Other expenses related to the employment extension
- Background checks

*Costs for personal documents **will be borne by workers** in the following circumstances or situations:

- The documents being lost or misplaced or damaged
- The documents are not initially required by Thai Union
- The provided documents require updates due to inaccurate information caused by unauthorized worker edits, corrections, strike-throughs, or scratch-outs such as adding handwritten notes, highlighting text, or crossing out sections.
- The worker already possesses valid aforementioned documents prior to applying for a job at Thai Union

*For the above mentioned, Thai Union will not reimburse any costs related to document issuance.

Other Related Costs

- Medical check-up, Health insurance and Vaccine as required by law
- Uniform, health and safety equipment
- Pre-departure training costs

Any recruitment fees and associated costs, such as travel expenses from the current residence to the interview site, not initially covered in full by Thai Union or its subsidiaries, will be reimbursed within 30 days after the commencement of onsite work or within the legally mandated timeline, whichever is more stringent.

For job seekers who fail the job application (e.g. failing to pass a health examination or qualification test) at any point in the recruitment process, they shall be entitled to reimbursement for the fees or costs already incurred as soon as practicable or within the legally required timeline, whichever is more stringent.

However, if job seekers voluntarily withdraw from the job application process, they are not entitled to any reimbursement for the fees or costs already incurred prior to their withdrawal.



Monitoring Compliance & Access to Remedy

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

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

Where workers are negatively impacted from noncompliance to this Policy, they shall be entitled to effective remedies provided or facilitated by Thai Union and/or recruitment agents. Agencies found charging workers illegal and/or irregular fees, either directly or through subagents, beyond those agreed in advance between Thai Union or its subsidiaries and the recruitment agencies, will be terminated following procedures in place to ensure no negative impact to recruited workers. The recruitment agencies shall then also be required to repay all irregular fees to the jobseekers and workers within 30 days after the incidence of overcharging is confirmed through investigation.

In the case where workers are found to have paid recruitment-related fees and costs that should have been covered by Thai Union, repayment to affected workers shall be made as soon as possible. Repayment should be made within 30 days after the incidence of excessive payment is confirmed through investigation.

Policy Integration and Measurement:

Key performance indicators (KPIs) Development and Monitoring will be established and deployed to systematically assess the efficacy of policy implementation and progress towards ethical recruitment goals. Regular reviews and adaptations of these KPIs will ensure sustained alignment with international best practices. Some specific KPIs are:

- Recruitment Costs Repaid within the policy: The percentage of recruitment costs repaid to workers, including those who fail medical screening or fail during the recruitment process.
- Ethical Recruitment Training: The number of workers and relevant stakeholders who have received training on ethical recruitment practices and policies.
- Incidents and Grievances: The number and nature of incidents or grievances related to recruitment and employment practices, with a focus on the resolution of such cases.
- Worker Satisfaction: Surveys or feedback mechanisms to gauge worker satisfaction with the recruitment process and employment conditions.

Review and Improvement

This policy will be subject to periodic review and improvement to stay current with evolving standards and regulations, demonstrating our ongoing commitment to ethical recruitment.