



Thai Union Group Non Reprisal Policy

1. Purpose

It is Thai Union's policy and practice to observe the highest ethical standards, and to create a workplace free of inappropriate, unfair and unlawful behavior. All Thai Union employees must practice honesty and integrity in fulfilling their responsibilities and comply with applicable policies, codes, laws and regulations. These responsibilities are specified in Thai Union Employees Code of Conduct.

Thai Union's Non-Reprisal Policy is designed to encourage and enable all Thai Union's workforce including employees, officers, directors, contractors and temporary workers to voice their concerns, seek advice, file a complaint or grievance, testify or participate in investigations, proceedings or hearings, without fear of retaliation.

This Policy will also help create a positive workplace culture that prevents unfair and unlawful retaliation against employees. In addition, the Policy also improves overall employee satisfaction and engagement, and ultimately helps prevent all workforce from committing violations of laws, regulations, and Thai Union policies.

2. Policy Statement

Thai Union shall:

- prohibit all forms of retaliation against: (1) any whistleblower who in good faith reports or attempts to report actual or suspected violation of laws, regulations, or Thai Union's policies or codes, including any employee who raises issues, grievances, suggestions, or feedbacks about workplaces. These include all members of, and/or those that participate in activities of worker representation bodies and collective bargaining activities, (2) any witnesses or any other employees involved in investigations of whistleblowing reports;
- provide at least one channel where employees can anonymously: (1) report violations of laws, regulations, or Thai Union's policies or codes including violations against this Policy itself; and (2) raise issues, grievances, suggestions, or feedbacks. Anonymous channel is defined as a channel whereby a user does not have to reveal his or her identity. Examples of anonymous channels are suggestion boxes, anonymous hotline or the whistleblowing system "**Speak Out - Thai Union Compliance Reporting Hotline**";
- protect whistleblowers or any other employee involved in the investigation, including witnesses from potential retaliation;
- investigate any reported violations from whistleblowers and/or any employee;
- keep confidential whistleblowers' and witnesses' identities and information included in the whistleblowing reports. Relevant Information shall be disclosed only to persons involved in the resulting investigation process such as witnesses. Disclosure to other persons is acceptable only when it is required by law, regulation, or court decision;
- Keep all communication from all employees confidential except if such disclosure is required by law, regulation or court decision and protect all employees from any resulting reprisal.

บริษัท ไทยยูเนียน กรุ๊ป จำกัด (มหาชน)
THAI UNION GROUP PUBLIC COMPANY LIMITED
TAX ID & Registered No. 0107537000891

Head Office
72/1 Moo 7, Sethakit 1 Road,
Tambon Tarsrai, Amphure Muang
Samutsakorn, Samutsakorn 74000
Thailand

T 66 (0) 34 816 500
F 66 (0) 34 816 499
thaiuniongroup.com

Bangkok Office
979/12 M Floor, S.M. Tower,
Phaholyothin Road, Samsennai,
Phayathai, Bangkok 10400
Thailand

T 66 (0) 2298 0537-41
F 66 (0) 2298 0550

3. Scope

This Policy is applicable to all Thai Union employees including employees from majority owned subsidiaries and affiliates. The Policy applies to all instances of whistleblowing or grievance reporting received from any channel such as but not limited to suggestion boxes or “**Speak Out - Thai Union Compliance Reporting Hotline**”, including external channels such as non-governmental organizations (NGOs) and government authorities.

4. What is reprisal?

Reprisal in workplace is generally any action, statement, or behavior that is expressed adversely to punish a whistleblower for reporting or attempting to report whistleblowing events or to punish any employee who raises issues, suggestions, or feedbacks about workplaces or to discriminate and/or punish any employee for their membership or non-membership or participation in activities of any worker representation body, including collective bargaining activities. It can occur when anyone takes an unfavorable action against an employee due to his/her engagement in reporting workplace concerns or collaborating as witnesses or investigators in the investigation process.

Act of reprisal may come in various forms including verbal or non-verbal behaviors. Examples of reprisal include, intimidation, threat, coercion, discrimination, or retaliation such as for example:

- Deduction or withholding of compensations or benefits
- Demotion, suspension, or termination of employment
- Harassment or bullying
- Changing work responsibilities or assignments without prior notice
- Taking away opportunities for career advancement
- Excluding an employee from important meetings in which s/he is involved in the topic
- Threatening or intimidating in any possible way an employee who has made a report
- More subtle actions, such as isolating, ostracizing, mocking, or falsely accusing the employee of poor performance and any other manner of discrimination.
- Discriminating or punishing workers for their membership or non-membership or participation in activities of any worker representation body, including collective bargaining activities

5. What is whistleblowing?

A whistleblower is a person who reports to Thai Union or relevant authorities any activity or conduct that he or she considers or suspects to be illegal, dishonest, unethical, contrary to Thai Union’s policies or codes, or otherwise improper. A whistleblower could be a direct victim or merely know about the reported violation.

6. Reporting retaliation Procedures

Thai Union considers having rigorous and inclusive reporting procedures very important. Anyone may report, with genuine and sincere concern, actual or suspected violation of this Non Reprisal Policy to Thai Union throughout several channels available both internally and externally with guaranteed confidentiality.

The channels for reporting on the Policy violation are listed on the website <https://www.thaiunion.com/en/sustainability/code-of-conduct>.

In addition, internal grievance channels are also available such as suggestion boxes and internal helpline. Details of the internal grievance channels are shown at an easily visible location of each facility, workplace, or office.

Thai Union commits to provide at least one anonymous channel at each work site.

7. Investigation Procedure

Thai Union takes seriously all whistleblowing and grievance reports and investigate them fairly and transparently. The investigation shall be conducted in a fair and balanced manner with the purpose of objectively ascertaining what transpired. All information from the investigation will be shared on a strictly need-to-know basis in order to preserve confidentiality. We maintain and implement the same highest standard for the investigation process of all reported cases including allegation of retaliation in the workplace.

Relevant Information shall be disclosed only to persons involved in the resulting investigation process such as witnesses, and they are also required to keep all relevant identities and information confidential. Disclosure to other persons is acceptable only when it is required by law, regulation, or court decision.

The assignee investigator, being as the case may be: local, regional or corporate HR manager, or SHE manager, will take appropriate action on the basis of objective criteria to address the concerned violation and timely inform the whistleblower of step(s) taken. If need be, exchanges preserving confidentiality will take place with the whistleblower.

The assignee investigator may assign the report to another appropriate investigator (e.g. legal department, internal audit, or external law firm), who will be submitted to the same stringent rules of utmost confidence.

The report may also be escalated to the Compliance Committee.

Conflict of interest: should a report reflect a reprisal concern relating to an individual mentioned above (for example a member of HR team, etc.), such individual will not be allowed to investigate the case.

As regards reports made through our whistleblowing system “**Speak Out - Thai Union Compliance Reporting Hotline**”, the applicable investigation procedure is detailed in the Global Whistleblower and Investigation Policy.

8. Policy Implementation

HR department and/or Business Units Directors of all majority owned Thai Union subsidiaries and affiliates shall strictly enforce and localize the implementation of the Non-Reprisal Policy, subject to relevant laws and regulations. At minimum, management system of each subsidiary/affiliate should consider the following essential aspects:

- Communication of the Policy to all levels of employees;
- System for listening to and resolving employee’s whistleblowing events;
- System for receiving and responding to reports of reprisal;
- Strict chain of custody of information to ensure confidentiality throughout the process of handling whistleblowing or grievance reports;
- Potential disciplinary measures for employees engaged in retaliation;
- Periodic review of Policy effectiveness including monitoring and review of retaliation cases and how they are handled.

9. Consequences of violating this Policy

A Thai Union employee, officer or director who retaliates against someone who has reported a violation in good faith may be subject to disciplinary action up to and including termination of employment.

10. Responsibility

This Policy has been validated by the Group Compliance Committee.

The Human Rights Manager is responsible for monitoring and updating this Policy.

Should you have any question regarding this Policy please contact:

- + Prad Kerdpairoj: Prad.Kerdpairoj@thaiunion.com, tel: +66(0) 2298-0024 (Thailand), or
- + David Sankowicz: david.sankowicz@thaiunion.com, tel: +33 1 53 77 17 43 (French time zone) or
- + Guénaëlle Guérault: guenaelle.gueroult@thaiunion.com, tel: +33 1 76 77 54 18 (French Time zone)

Approved by the Group Compliance Committee

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