

Human Rights Due Diligence Framework

Update as of June 2021

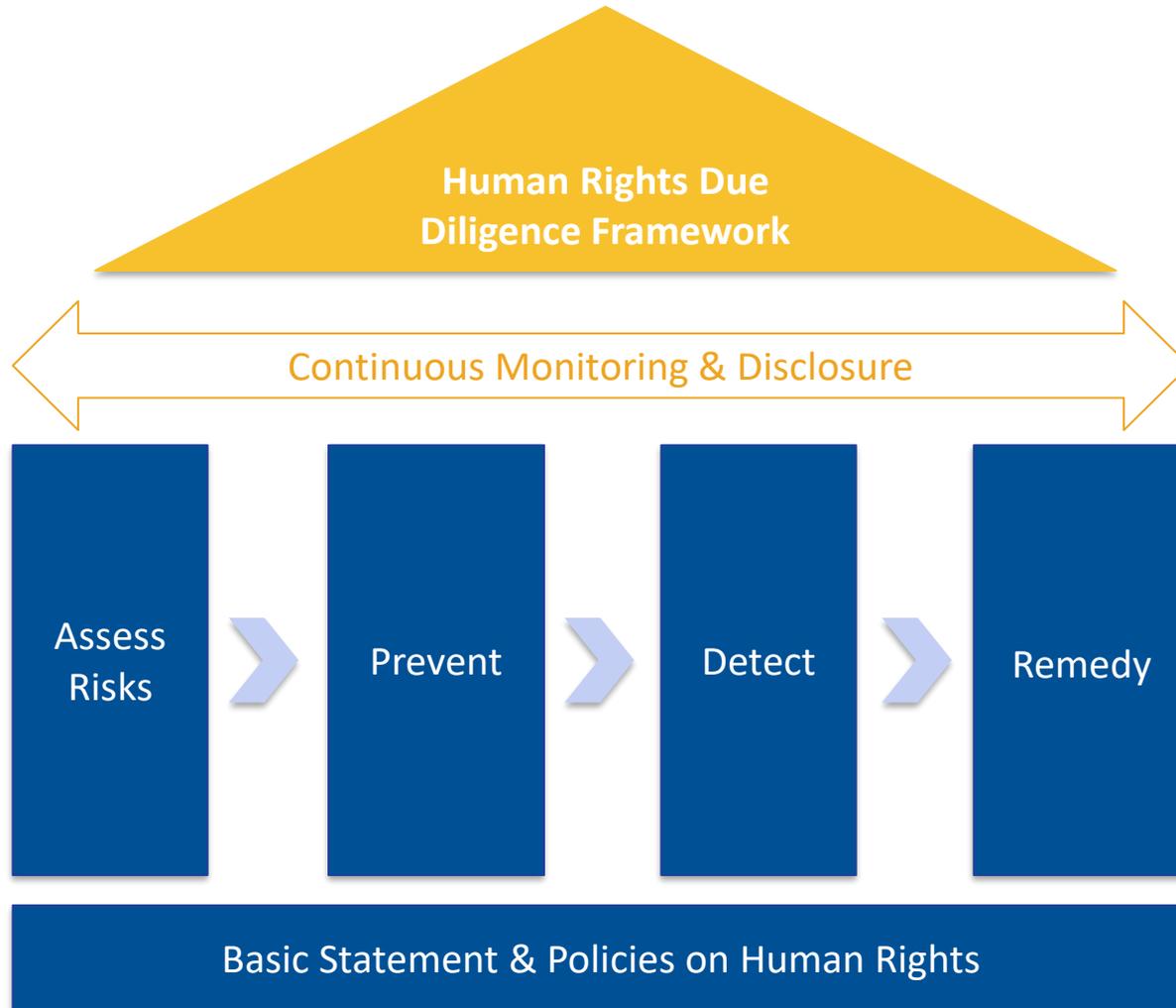


OUTLINE

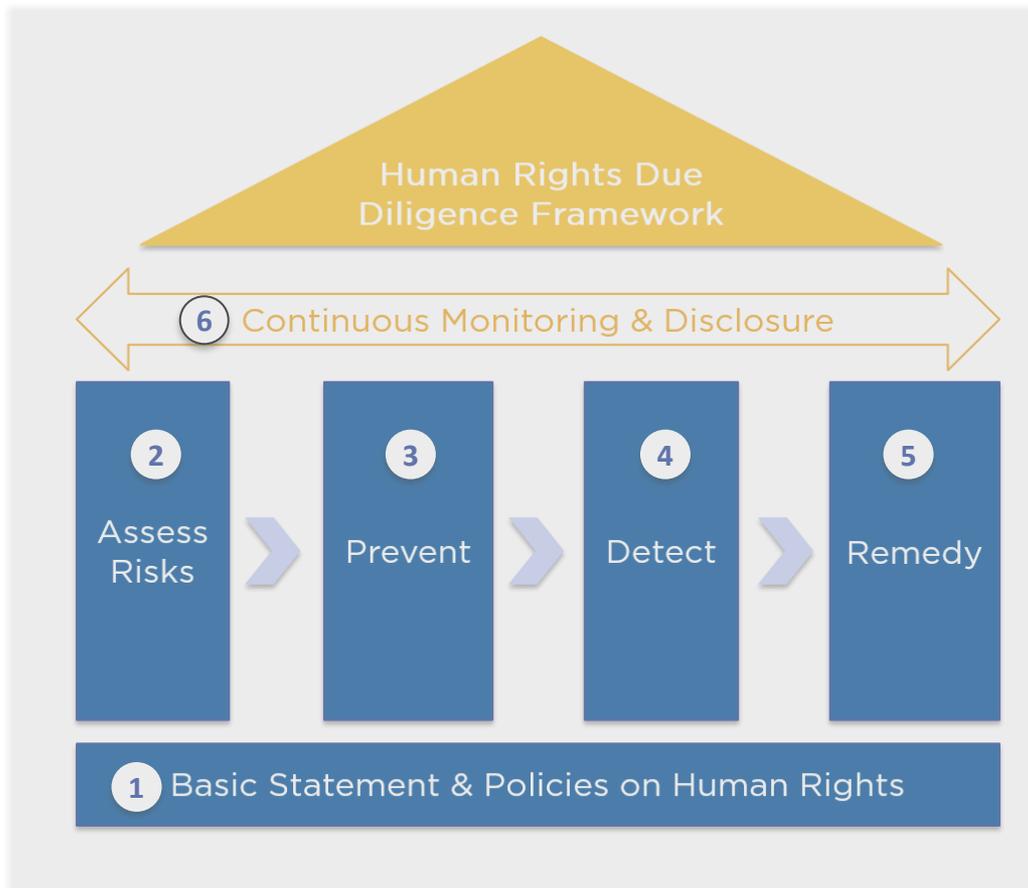
- Human Rights Due Diligence Framework
- Operating Principles
- Recent Activities & Initiatives
- Way Forward



Thai Union's Human Rights Due Diligence Framework



Component of the Framework – Brief Description of Six Pillars



- 1** Fundamental commitment, strategy, targets, and policies on human rights
- 2** Assessment of actual and potential risks of human rights violations linked to our operations and value chains
- 3** Prevention or minimization of human rights violations risk in our operations and value chains
- 4** Detection of human rights violations and non-compliance with laws or best practices that leads to increased human rights risks
- 5** Provision or facilitating access to remedies for affected right holders
- 6** Tracking and disclosing progress and effectiveness of due diligence activities

Thai Union's Three Operating Principles Guide the Implementation of our Human Rights Due Diligence Framework.

Good Governance

- Robust leadership, policies, processes to ensure our business is focused on delivering human rights related objectives

Transparency

- Regular public disclosure and experience sharing on our human rights performance through Thai Union's Annual Report, Sustainability Report, Webpages, Conferences, and other channels

Partnerships & collaborations

- Collaboration with NGOs, labor unions, governments, and industry partners to implement & continuously improve our human rights due diligence activities

Pillar 1

BASIC STATEMENT & POLICIES ON HUMAN RIGHTS

Thai Union’s fundamental commitment on human rights and the belief in our unique roles in addressing human rights issues within our company, value chains, and the global seafood industry.



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High-level Principles

UN Guiding Principles on Business and Human Rights

UN Global Compact's Ten Principles

Thai Union commits to support and respect internationally proclaimed Human Rights. We recognize our responsibility to avoid infringing on human rights of others and address human rights impacts with which we are involved within our operations and value chain.

We have committed to implementing the commitments in the UN Global Compact's Ten Principles since 2013.

UNITED NATIONS
GUIDING PRINCIPLES
ON BUSINESS
& HUMAN RIGHTS



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High-level Principles

UN Guiding Principles on Business and Human Rights

UN Global Compact's Ten Principles

We believe that it is our responsibility to uphold the human rights of others and address adverse human rights impacts within our operations and the value chain.

We have been committed to implementing the commitments in the UN Global Compact's Ten Principles since 2013.



In 2018, we officially launched the UN Global Compact Network Thailand, along with other founding members.

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seaCHANGE

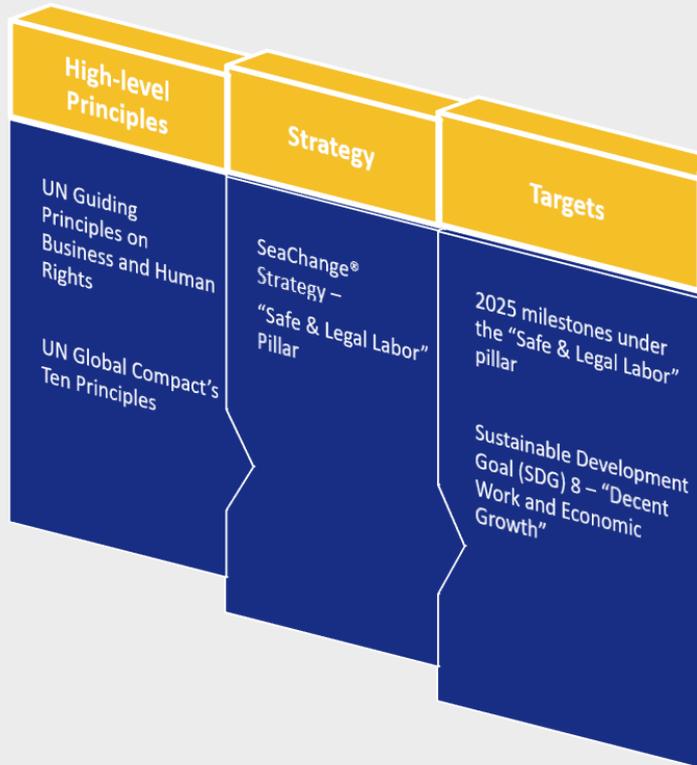
SeaChange® is Thai Union's overarching sustainability strategy designed to deliver real and lasting changes in the way that we operate in the wider Thai and global fishing industries.

The objective of the "Safe & Legal Labor" Pillar is to provide safe, legal, and freely-chosen employment in our facilities and supply chain.

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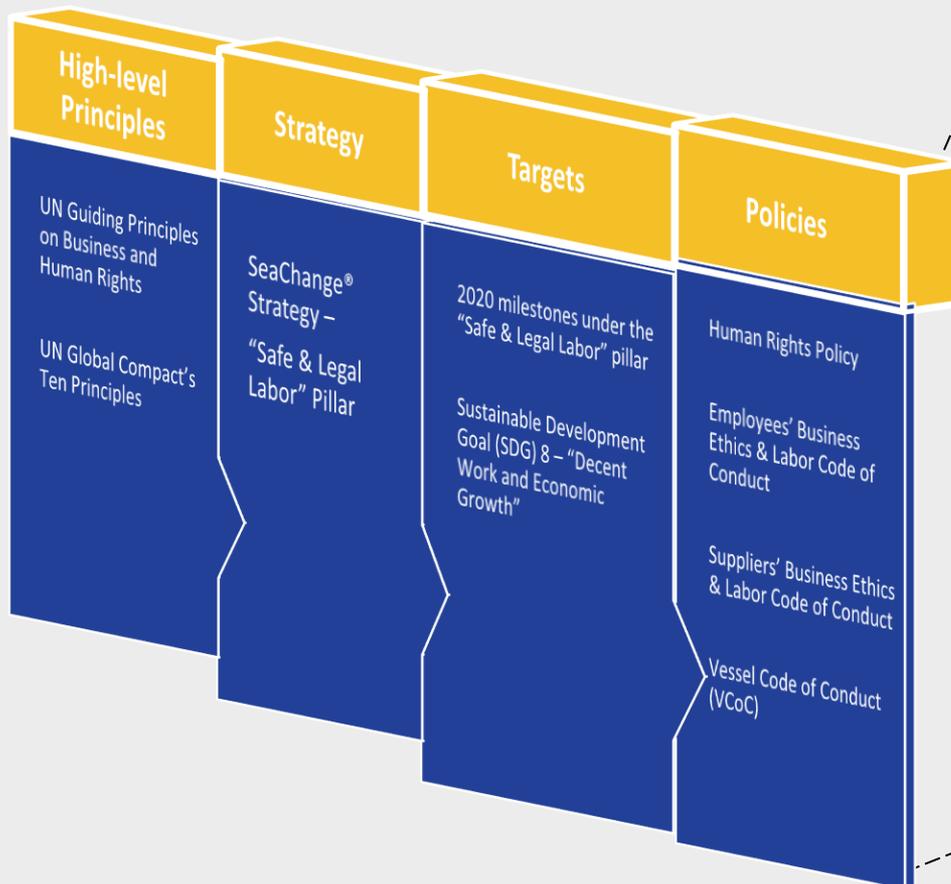


- We will treat all workers, whether migrant or local employees, fairly and with dignity. They will have safe and freely-chosen employment supported by ethical recruitment practices.
- Our land-based operations and supply chains will comply with our Business Ethics and Labor Code of Conduct, and at sea 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.

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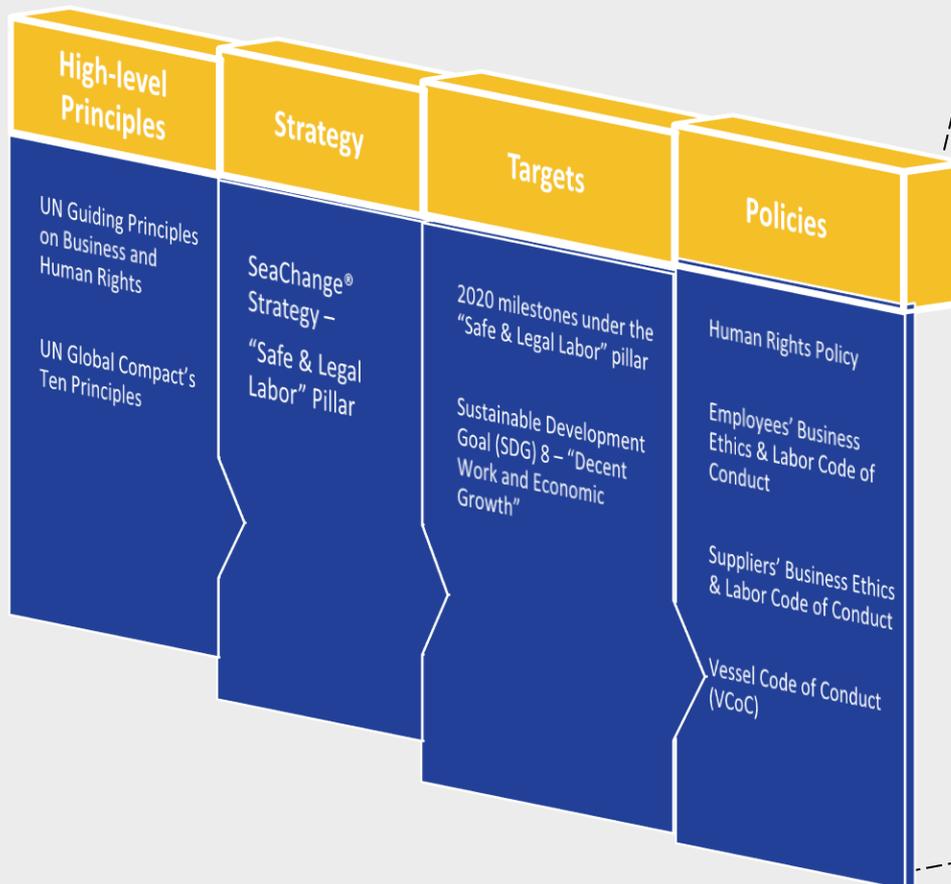


- **The Human Rights Policy states our commitment to respect human rights throughout our value chain.**
- **The Suppliers' Business Ethics & Labor Code of Conduct (CoC) states our commitment and expectation of our suppliers' and contractors' commitments to respect labor rights throughout our value chain.**
- **The Vessel Code of Conduct (VCoC) is an extension of the CoC but takes into account unique working conditions on fishing vessels.**
- **Enforcement and implementation of these policies are supported by secondary prevention, detection, remediation policies and activities described in the subsequent pillars.**

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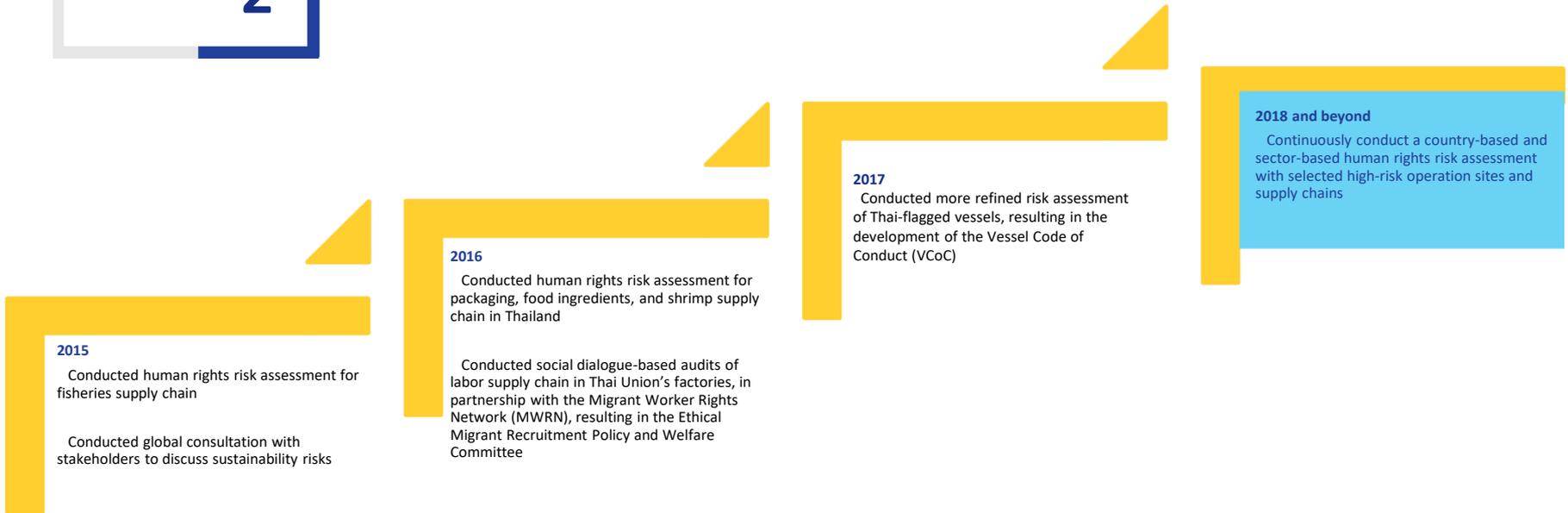
Thai Union's Business Ethics & Labor Code of Conduct (CoC) and Vessel Code of Conduct states our commitment which encompasses 12 fundamental principles, namely:

1. Business is conducted lawfully and with integrity.
2. Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance.
3. All workers are treated equally and with respect and dignity.
4. Work is conducted on a voluntary basis with no forced or compulsory labor.
5. All workers are of an appropriate age.
6. All workers are paid fair wages.
7. Working hours for all workers are reasonable.
8. All workers are free to exercise their right to form and/or join trade unions and to bargain collectively where permitted by law.
9. Workers' health and safety are protected at work.
10. Workers have access to fair procedures.
11. Business is conducted in a manner that embraces sustainability and reduces environmental impact.
12. Progress and compliance are monitored.

Pillar 2

ASSESS RISKS

Assessment of actual and potential risks of human rights violations caused by, or linked to, Thai Union's operations and value chains



Eight (8) salient human rights risks identified 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 to negotiate
- Child labor
- Excessive overtime
- Unsafe & unhealthy working conditions
- Community health & safety in the event of major accidents in production plants
- Consumer health & safety

Pillar 3

PREVENT

Thai Union implements policies and measures to prevent or minimize risks of human rights violations within our company's operations and value chain.

Examples



Demonstration Boat to Promote Human Rights in the Fishery Industry

In 2017, Thai Union and Nestlé launched the successful first departure of a demonstration boat built to raise awareness among fishing boat owners, captains and crew of best practices to ensure the fair, safe and legal treatment of workers on vessels in the Thai fishing industry.



Ethical Migrant Recruitment Policy

In April 2016, Thai Union issued an [Ethical Migrant Recruitment Policy](#) that covers all aspects of recruitment and hiring of migrant labor throughout Thai Union. The policy aims to reduce the risk of abuse or extortion by agents in the recruitment process. An [independent evaluation](#) of the policy was published in 2019. In 2021, we issued an updated Ethical Migrant Recruitment Policy to reflect our intention to pay for additional recruitment-related costs for workers.



Health & Safety Training

In 2018-19, we hosted a series of health & safety training workshops for fishers in Thailand, in collaboration with the International Transport Workers' Federation (ITF). 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. More than 300 participants in our supply chain attended the training, and we plan to conduct more sessions in 2021, pending COVID-19 related travel and visit restrictions.



Ensuring our employees know their rights

Since 2014, migrant workers in our Thai facilities have received formal training on Thai labor and social welfare regulations in collaboration with the Labour Promotion Network (LPN). We are also rolling out in-house Code of Conduct (CoC) training for all employees.

Pillar 4

DETECT

Thai Union implements measures to identify actual human rights violations and to identify non-compliance with laws, regulations, or global best practices that could potentially lead to increased risks of violation in both our operations and value chains.

Examples



Vessel Audits

We started to implement our Fishing Vessel Improvement Program and Vessel Code of Conduct (VCoC) to provide guidance to fishing vessels in our supply chain as well as improve labor and ethical performance in the fishing industry. Third-party audits against the VCoC began in 2018 for Thai fleets and global tuna fleets. We plan to conduct more third-party audits in 2021.



Social Audits of Thai Union's Factories

Our facilities 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 Trading Initiative (ETI) Base Code; Amfori BSCI; SMETA. Our internal audit program covers social audits of Thailand-based subsidiaries against our Business Ethics and Labor Code of Conduct.



Providing workers with a voice

Since 2014, we have partnered with the Issara Institute to improve worker conditions in Thailand. In 2015, we provided workers with access to Issara's independent worker helpline – available in five languages – in our factories and ports in our supply chain. In 2019, we rolled out a [third-party global whistleblowing platform](#) which will be accessible to all our employees globally. Employees will be able to file a complaint via web intakes or telephone hotlines in their own language.



Welfare Committee

In Thailand, all of our factories have established welfare committees whose role is to provide consultations and opinions about welfare issues. Starting in 2016, the Migrant Workers Rights Network (MWRN) worked with Thai Union to promote and support the election of migrant workers to the committee. To share our learning and experience, we published a short [case study](#) on our welfare committee approach.

Pillar 5

REMEDY

Thai Union provides remedies or facilitates access to remedies to affected rights holders in the case where we cause or contribute to adverse human rights impacts.

Examples



Reinforcing internal grievance mechanism through “Tell Us” Project

In collaboration with Verité, in 2019 we began a Project named “Tell Us” to strengthen worker voice mechanisms in five of our key processing facilities in Thailand. Among other things, the program will raise the capacity of our Human Resources staff to capture, investigate, and provide remediation for complaints raised by workers.



Protecting pre-processing workers

In 2016, over 1,000 former employees from external pre-processing facilities have been employed to work in Thai Union factories in Thailand. We ended all relationships with external pre-processing facilities so we have full oversight of all processing stages in the supply chain.



Supporting Human Rights Defender

We supported human rights defender Mr. Andy Hall through collaborative work, financially supporting his legal case, and with statements at his court hearing.



Helping victims of human trafficking

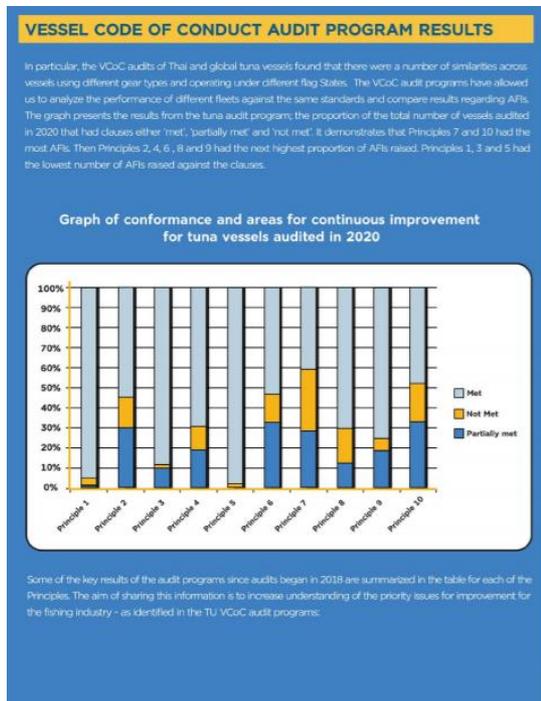
In 2015, we initiated a pilot program with LPN to deliver counselling, medical assistance, temporary food and shelter, and to provide legal aid to repatriated men who had been victims of human trafficking.

Pillar 6

CONTINUOUS MONITORING & DISCLOSURE

Thai Union strives to measure and disclose progress of its human rights' due diligence activities and their impact to ensure that we achieve the intended outcome.

Examples of Disclosed Indicators



HUMANITY UNITED **THE FREEDOM FUND**

In 2018, with support from Humanity United and the Freedom Fund, an independent researcher conducted an evaluation of Thai Union’s Ethical Migrant Recruitment Policy to document and share our experience and externally assess its early impact. Results were subsequently published in 2019. Furthermore, the ethical recruitment roadmap was published to provide guidelines to other businesses pursuing ethical recruitment.

Thai Union’s Sustainability Report is in alignment with GRI Guidelines and the UN Global Compact Communication on Progress.



Operating Principle 1

GOOD GOVERNANCE

Robust leadership, policies and processes to ensure our business is focused on delivering human rights related objectives.

Board of Directors

Global Leadership Team (GLT)

Global Director of Corporate Affairs and Sustainability is a member of the GLT and reports to the GLT on sustainability issues and progress

Risk Management Committee

Global Director of Corporate Affairs and Sustainability is a member of the committee and updates quarterly on key sustainability risks and tracking progress

Global Sustainability Committee

A committee comprising team members across functions and locations, chaired by the Global Director of Corporate Affairs and Sustainability

Global Environmental, Health, and Safety Committee

A committee comprised of representatives from Thai Union's plants around the world to address key environment, health and safety issues

More information about sustainability governance can be found in [2020 Annual Report](#).

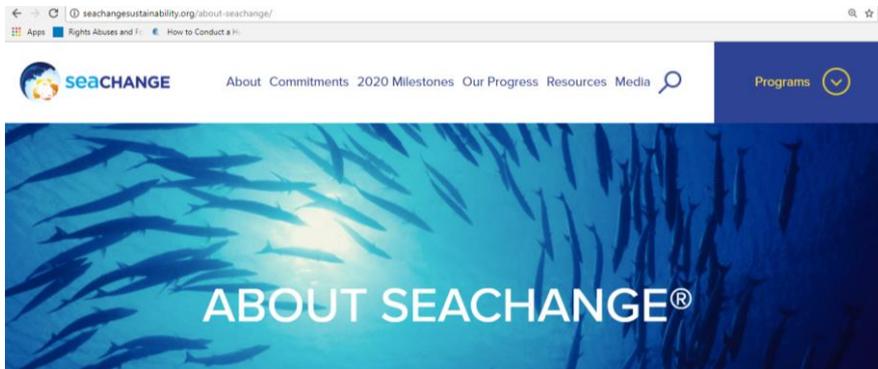
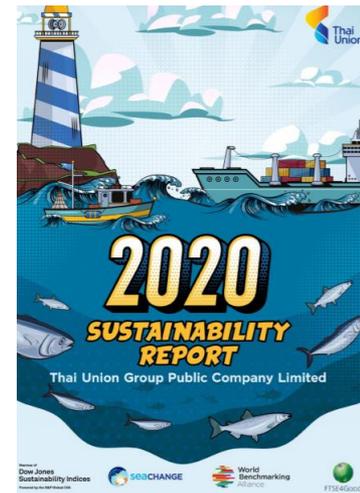
Operating Principle 2

TRANSPARENCY

Regular public disclosure and experience sharing on our human rights performance through Thai Union's Annual Report, Sustainability Report, Webpages, Public forums, and other channels



Dr. Darian McBain, Global Director of Corporate Affairs & Sustainability at Thai Union, addressing world leaders on modern slavery at the 2018 United Nations General Assembly.



Main Reports on Human Rights

- UK Modern Slavery Act Transparency Statement
- California Transparency in Supply Chain Statement
- Annual Sustainability Report
- Safe and Legal Labor Update Report

Operating Principle 3

PARTNERSHIPS & COLLABORATIONS

Collaboration with NGOs, labor unions, governments, and industry partners to implement & continuously improve our human rights due diligence activities

Issara's helpline and mobile apps for Thai Union factory workers

- Implementation of the Vessel Code of Conduct (VCoC)
- Training on health & safety for fishers

- Training on child labor, human trafficking, children's rights to education
- LPN Hotline for Thai Union's factory workers

- External audits of shrimp feed supply chain in 2015/2016
- Participation in various Task Force's subgroups for industry-wide improvement



- Roll-out of Good Labor Practice (GLP) in Thai Union factories
- Training on labor rights with vessel owners

- Social dialogue-based audit of TU's Thailand facilities in 2016
- Strengthening migrant workers' participation in the Welfare Committees
- Monitoring of excessive recruitment fees and pre-departure training for migrant workers

- Modelling effective internal worker voice mechanisms for Thai Union's factories and wider seafood industry
- Training of Thai Union's in-house auditors
- Demonstration boat project to show decent working & living conditions on vessels

Recent Key Activities & Initiatives, by pillars*

Pillar 1 Basic Statement & Policies on Human Rights	Pillar 2 Assess Risk	Pillar 3 Prevent	Pillar 4 Detect	Pillar 5 Remedy	Pillar 6 Continuous Monitoring & Disclosure
<ul style="list-style-type: none"> Published Global Non-Reprisal Policy Published Policy on Responsible Sourcing of Palm Oil to ensure social and environmental sustainability of palm oil in our supply chain Published Policy on Responsible Sourcing of Tuna Published updated Ethical Migrant Recruitment Policy 	<ul style="list-style-type: none"> Continue to conduct more granular country-based and sector-based human rights risk assessments for selected high-risk operation sites and supply chains Commissioned independent human rights risk assessment of seafood raw materials in our Chicken of the Sea Frozen Food's supply chain. 	<ul style="list-style-type: none"> All mitigation action plans to mitigate and prevent human rights risks remain in place for 100% of our operations sites. Ongoing training on Thai Union's CoC including the topics of anti-harassment and anti-discrimination Implemented special health and hygiene measures to minimize COVID-19 infection risks for our employees 	<ul style="list-style-type: none"> Continuing external audits of global fleets against the Vessel Code of Conduct (VCoC) Initiated in-depth audits of the labor recruitment process of fishers in our supply chain 	<ul style="list-style-type: none"> Began to implement a systematic remediation guideline in our Thailand-based operations, to ensure that remedies provided to affected individuals are compatible with human rights. Began to implement a rating system of labor rights complaints or grievances in our Thailand-based operations, to ensure that issues are investigated and resolved in a manner that is timely and compatible with human rights 	<ul style="list-style-type: none"> Published our annual update of the UK Modern Slavery Act Transparency statement Published our 2020 annual Sustainability Report

• This slide cover recent key activities & initiatives during April 2020-May 2021. Further details about our human rights-related activities are shared in our annual Sustainability Report, UK Modern Slavery Act Transparency Statement, and SeaChange® website.

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REVIEW SEACHANGE[®]

SeaChange[®] is designed to deliver real and lasting changes in the way that we operate and in the wider Thai and global fishing industries.

[EXPLORE MORE](#)



www.seachangesustainability.org