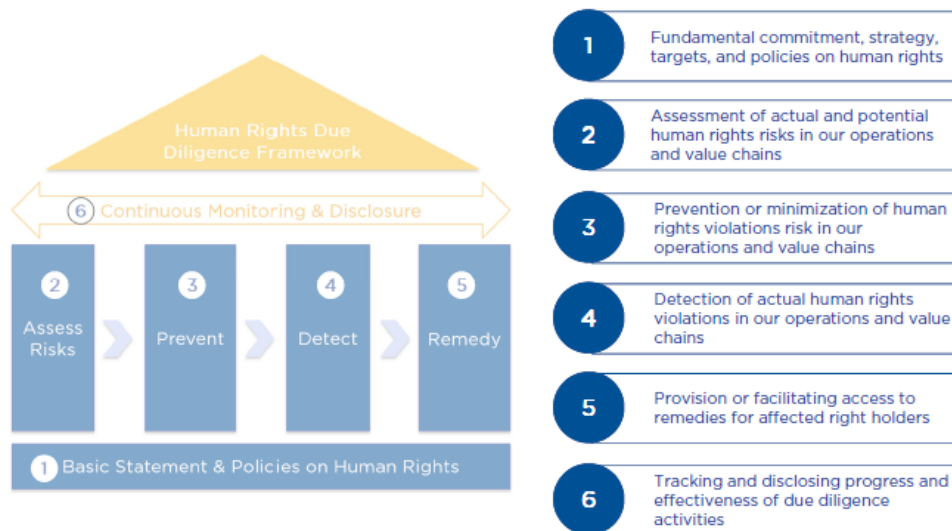


Thai Union’s Human Rights Risk Assessment

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”). We use findings from previous risk assessment exercises to inform our key activities, policies, and measures to prevent or minimize human rights risks, detect cases of human rights harms, and facilitate access to remedies for affected rights holders, in both our operations and supply chains. These various efforts are explained in our [SeaChange® sustainability website](#), our annual [Sustainability Report](#), our [Safe and Legal Labor Update](#) as well as [the UK Modern Slavery Act Transparency Statement](#).

Component of the Framework – Brief Description of Six Pillars



Previous and Current Efforts in Human Rights Risk Assessments

In 2015, we conducted human rights risk assessments for our [fisheries supply chain](#) and, separately, a global consultation with stakeholders to discuss sustainability risks including human rights risks.

In 2016, we conducted human right risk assessments [for packaging, food ingredient, and shrimp supply chain in Thailand](#). In addition, we conducted social dialogue-based audits of labor supply chains in Thai Union’s factories, in partnership with the Migrant Worker Rights Network (MWRN), an NGO. In particular, the labor supply chain assessment found a high risk of abuse and extortion by job recruitment agencies.

In 2018, we conducted desk-based research on human rights risks 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 was to help us get a more granular understanding of the risks and compare risks across the countries in order to prioritize our efforts.



In 2019, we repeated the desk-based research on human rights risks at a country level using a similar method to the previous exercise in 2018 but with more updated data sources.

Going forward, we will continue to further refine risk assessment findings by considering: (i) wider scope of human rights risks (beyond labor trafficking, forced labor and child labor) and (ii) fieldwork and consultation with stakeholders, prioritizing on parts of operations and supply chains that have been identified as a high priority from previous risk assessment exercises.

Human Rights Risk Assessment Methodologies & Results

The human rights risk assessments conducted in 2015-2016 were based on a combination of risk analysis methods such as "Supply chain mapping" and "Activity-based risk analysis through audits and social dialogue". Based on these exercises, we have identified the eight following salient human rights risks in both 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 lack of worker voice
- Child labor
- Excessive overtime
- Unsafe and unhealthy working conditions
- Community health & safety in the event of major accidents in production plants
- Consumer health & Safety

For 2018 and 2019, we conducted two annual country-level human rights risk assessments with a focus on the issues of labor trafficking, forced labor and child labor. These three issues are closely linked to the salient human rights risks identified above.

In particular for 2019, we conducted the assessment for the 14 countries that have at least one Thai Union production or processing facility. These cover production or processing activities by Thai Union's own subsidiaries, associated companies, and joint ventures where Thai Union has management controls¹. Separately, the assessments were conducted for the 19 countries where our tier-one suppliers operate².

Both sets of assessments rely on key indicators found in three public reports pertaining to labor trafficking, forced labor and child labor. These are: [the 2018 Trafficking in Persons Report](#), [the 2018 Global Slavery Index](#) by the Walk Free Foundation and International Labour Organization (ILO), and the [US Department of Labor's 2018 List of Goods Produced by Child Labor or Forced Labor](#). First, we rank the countries for each indicator of labor trafficking, forced labor and child labor found in these public sources. It should be noted that an individual country ranking is not always aligned across the three data sources due to their different methodologies and focuses. Secondly, we compute a simple average ranking from all the indicators considered. We then group the countries into three categories or risk – high-priority, medium-priority, low-priority – based on average ranking. The "high-priority" Group represents an average higher risk than the "Medium Priority" and "Low Priority" Groups. The

¹ All Thai Union's subsidiaries, associated companies, and Joint Ventures are listed in our [2018 Corporate Annual Report](#).

² Thai Union's seafood sourcing locations are published in our [2018 Annual Sustainability Report](#).



results of risk ranking for the 14 countries where we operate and for the 19 countries where our tier-one suppliers operate are presented in the tables below.

Risk Assessment for Our Operations (2019)

High Priority	Medium Priority	Low priority
India Ghana Seychelles Thailand Vietnam	Lithuania Poland United Kingdom	Canada France Germany Norway Portugal United States of America

Risk assessment for our Tier-I suppliers (2019)

High Priority	Medium Priority	Low priority
Bangladesh China Honduras India Indonesia Mexico Philippines Thailand	Ecuador Peru Sri Lanka Vietnam	Argentina Canada Chile Norway Panama United Kingdom United States of America

In addition to using publicly available data sources to assess risk, we use the results of social audits of our processing facilities and suppliers to identify risks and to develop improvement programs to address them. For example, we have conducted third-party audits of fishing vessels in our supply chain against our [Vessel Code of Conduct \(VCoC\)](#) which focus on the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. Previous audit findings were used to develop [health & safety training workshops](#).

Going forward, we will continue to further refine risk assessment findings by considering: (i) wider scope of human rights risks (beyond labor trafficking, forced labor and child labor) and (ii) fieldwork and consultation with stakeholders, prioritizing on parts of operations and supply chains that have been identified as “high-priority” above. We will then use the updated risk assessment findings to inform our future activities to prevent, detect, and remedy human rights violations at a country or sector-level, based on our Human Rights Due Diligence Framework.