

UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2019

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 (Thai Union) to prevent, detect, and remedy violations of human rights, particularly modern slavery and forced labor within our operations and supply chains. The statement covers periods up to 10 July 2020. In summary, key highlights of recent activities & achievements for enhancing our due diligence on modern slavery and forced labor are:

- Conducting a survey of internal and external stakeholders on top sustainability issues of their concern, including those related to labor rights, for Thai Union to address in 2020 and to incorporate in our updated SeaChange® Strategy for 2021-25;
- Raising social compliance standards of fishing vessels in our supply chain through continuous implementation of our [Vessel Code of Conduct \(VCoC\) and Vessel Improvement Program \(VIP\)](#);
- Publishing [aggregate results of the third-party social audit](#) of fishing vessels in our supply chain against the VCoC in the [2019 Annual Sustainability Report](#);
- Publication of an [independent evaluation](#) of our Ethical Migrant Recruitment Policy so that broader community working on ethical recruitment can learn from our experience. The evaluation was led by ethical trade consultancy Impactt and commissioned by Humanity United and The Freedom Fund;
- Rolling out 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 and funded by Mars Petcare, Humanity United, and the Freedom Fund;
- Launch of *Speak Out - the Thai Union Compliance Reporting Hotline*, a new whistleblowing platform for all staff and workers to ensure strict compliance with ethical and legal standards in the workplace;
- Publication of our [case study on worker welfare committee](#) to share our experience and learning;
- Publication of the [independent audit](#) of Thai Union’s progress against the agreement with Greenpeace, which includes an action point to enhance labor rights due diligence on vessels supplying to Thai Union and social compliance for Thai Union facilities;
- Rolling out additional policies and measures to protect health & safety of workers in our operations amid the global COVID-19 pandemic;
- Piloting a project to apply blockchain technology for workers’ rights in partnership with KASIKORNBANK and Kasikorn Business Technology Group (KBTG). The project tested the ability of labor recruiters, workers, and Thai Union to store the digital signature of the personal document on blockchain. The intention is to enable workers to have greater access to their personal data and be less likely to encounter bonded or forced labor through control of their own personal documents;
- For the second year in a row, receiving the number one ranking globally in the Food Products Industry Index of the [Dow Jones Sustainability Indices \(DJSI\)](#) Emerging Markets, with industry best-in-class 100th percentile rankings in a number of areas, including Codes of Business Conduct and Human Rights;
- Receiving the number one ranking on the inaugural [Seafood Stewardship Index \(SSI\)](#), which assessed the contribution of the world’s 30 largest seafood companies to the UN SDGs, including the Goals related to human rights and working conditions;
- 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

1) ABOUT THAI UNION

Thai Union is a global seafood leader bringing high-quality, healthy, tasty and innovative seafood products to customers for more than 40 years. Thai Union is the world’s largest producer of shelf-stable tuna products with annual sales exceeding THB 133.3 billion (US\$ 4.1 billion) and a global workforce of over 44,000 people who are dedicated to pioneering sustainable, innovative seafood products.

Thai Union portfolio brands include global market leaders Chicken of the Sea, John West, Petit Navire, Parmentier, Mareblu, King Oscar, and Rügen Fisch, along with Thai-leading brands SEAELECT, Fisho, Qfresh, Monori, Bellotta and Marvo. In addition, we manufacture private-label products for a number of global retailers.

As a company committed to innovation and globally responsible behavior, Thai Union is proud to be a founding member of the UN Global Compact Network Thailand and a founding member of the International Seafood Sustainability Foundation (ISSF). In 2015, Thai Union introduced its [SeaChange®](#) sustainability strategy. Thai Union’s ongoing work on sustainability issues was recognized by its inclusion in the Dow Jones Sustainability Indices Emerging Markets (DJSI) in 2014. In 2019, for the second year in a row, Thai Union was ranked number one globally in the Food Products Industry Index of the DJSI. Our SeaChange® strategy helped drive our DJSI score to achieve best-in-class 100th percentile rankings for Codes of Business Conduct, Health & Nutrition, Materiality, Supply Chain Management, Environmental Reporting, Genetically Modified Organisms, Water Related Risks, Human Rights and Talent Attraction & Retention.

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 seafood-based products.

Thai Union has 16 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](#).

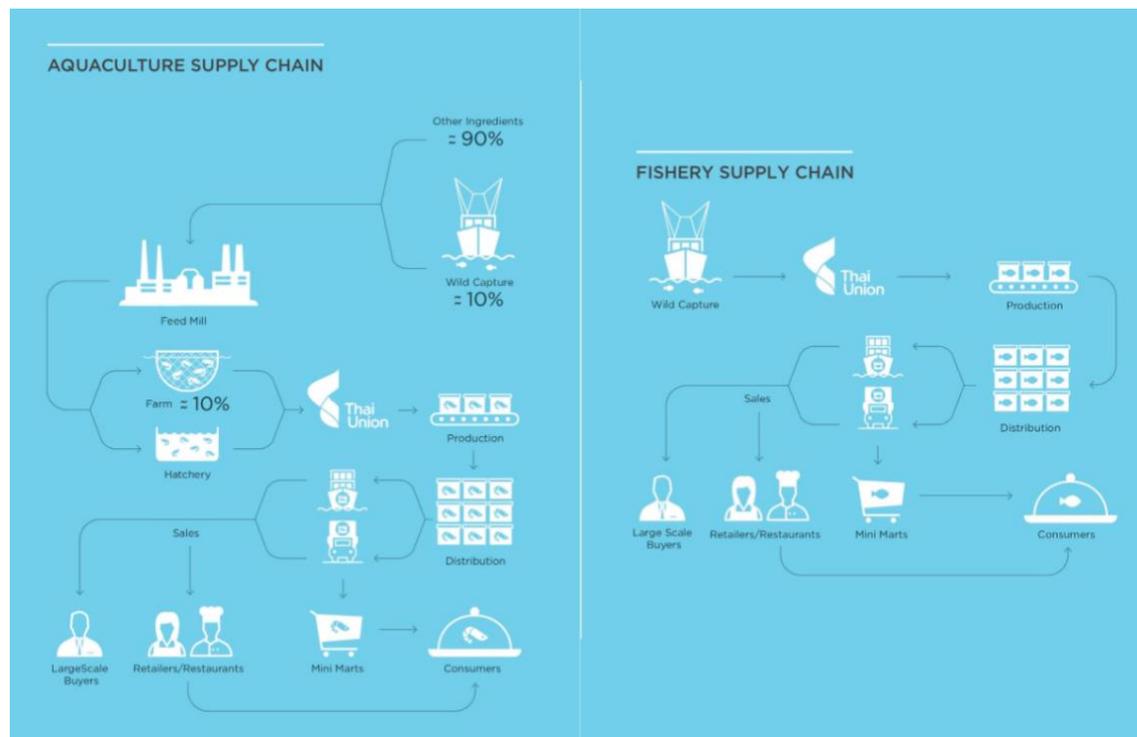


2) THAI UNION'S SUPPLY CHAINS

Seafood supply chains are complex, particularly where multiple species are involved. Thai Union is a processor. Globally, we do not own fishing vessels and own a very small number of aquaculture farms. Seafood raw materials are therefore sourced from suppliers from oceans and aquaculture operations around the world, and we use our market position to drive sustainable practices.

Thai Union sources from six main categories of seafood: tuna, shrimp, salmon, sardine, mackerel and cephalopod.

The supply chains for key seafood raw materials can be visualized as the following:



For transparency, we published the sourcing locations of key seafood species in our [Annual 2019 Sustainability Report](#). In addition, in collaboration with WWF, we published the [Sourcing Transparency: Wild Caught Fish and Shellfish Report](#) for our European operations, including species sourced and locations. This report covers products sold in the UK as well as across Europe and is in line with the Ocean Disclosure Project. In 2020, we will publish a Transparency Report covering our global operations, also in line with the Ocean Disclosure Project.

In addition to seafood raw materials, we also source a variety of food ingredients, packaging materials, and logistic services from suppliers based in the countries where we operate. It should be noted that Thai Union does not own any vessels.

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.



The 2020 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.
- Our supply chains, from vessel to factory, will comply with labor regulations and our Business Ethics and Labor Code of Conduct.
- With full traceability of all the seafood we purchase, we will have information about the labor practices on board vessels.
- 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.

In 2019, we conducted a survey of internal and external stakeholders on the top sustainability issues of their concern for Thai Union to address in 2020 and to incorporate in our updated SeaChange® strategy. Among other things, the findings indicate that the issue of human rights remains a key concern among our stakeholders. Further details of the survey findings can be found on pages 29-33 of our [Annual 2019 Sustainability Report](#). Based on the findings, we are currently setting 2025 milestones for our updated SeaChange® strategy.

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

3.2) Global Leadership in Sustainability for Industry Transformation

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. We regularly contribute to dialogues convened by the GCNT such as through our participation in the 2020 UN Global Compact Leaders Summit Webinar on how to Build Back Better and our participation in the sub-committee on business and human rights;
- **The Seafood Task Force** – Thai Union has been a proud and 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. In 2019, a representative of Thai Union was elected as a member of the Board of Directors.

- [Labour Promotion Network \(LPN\)](#) – LPN was formed to improve the lives of migrant laborers in Thailand by addressing the injustice brought on by discrimination and inequality. Thai Union has been partnering with LPN on labor rights training and a program on preschools for the children of migrant workers.
- [Migrant Worker Rights Network \(MWRN\)](#) - Thai Union has been partnering with MWRN to develop and implement our Ethical Migrant Recruitment Policy and Worker Welfare Committees.
- [International Seafood Sustainability Foundation \(ISSF\)](#) – Thai Union is a founding member of the ISSF, whose objective is to improve the sustainability of global tuna stocks.
- [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 funding 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.
- [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) conducted an [independent audit](#) of our 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.
- [International Labour Organization \(ILO\)’s “Ship to Shore Rights” Project](#) – The project works with the Thai Government, employers’ organizations, workers’ organizations and buyers towards the prevention and reduction of unacceptable forms of work in Thailand’s fishing and seafood industries. Thai Union has been an active partner of the project, particularly under the objective of improving compliance with the Fundamental Principles and Rights at Work through implementation of the Good Labour Practices (GLP). We previously conducted GLP training in our own facilities.

- [Mekong Club's Business Pledge Against Modern Slavery](#) – In August 2018, we became a signatory to the Business Pledge Against Modern Slavery. As a signatory, we declare our commitment to help end the crime of modern slavery across Asia and work to collect and share relevant information to inform business decisions, promote education and training, and contribute to the development of tools to help prevent and address modern slavery.
- [Be Slavery Free](#) - Thai Union's Global Director of Corporate Affairs & Sustainability Dr. Darian McBain is a member of the board of Be Slavery Free, which is a coalition of civil society, community and other organizations working together to prevent, abolish and disrupt modern slavery in Australia and around the world.

We also work 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 works on sustainability earn us awards and recognitions by leading organizations around the world. Recent examples from 2019 related to human rights include:

- For the second consecutive year, we were ranked number one globally in the Food Products Industry Index of the [Dow Jones Sustainability Indices \(DJSI\)](#) Emerging Markets, with industry best-in-class 100th percentile rankings for Codes of Business Conduct, Health & Nutrition, Materiality, Supply Chain Management, Environmental Reporting, Genetically Modified Organisms, Water Related Risks, Human Rights and Talent Attraction & Retention.
- Thai Union was ranked number one on the [inaugural Seafood Stewardship Index \(SSI\)](#), which assessed the contribution of the world's 30 largest seafood companies to the UN SDGs
- Thai Union's Global Director of Corporate Affairs & Sustainability Dr. Darian McBain received the Seafood Champion Award at the 2019 [SeaWeb Seafood Summit](#).
- Thai Union and WWF-UK have been recognized as leaders in 'Sustainable Supply Chains' at the [edie Sustainability Leaders Awards](#).
- Thai Union's Global Director of Corporate Affairs & Sustainability Dr. Darian McBain received the 2019 Freedom Award at the [Anti-Slavery Australia Freedom Award](#).
- Thai Union received the Stock Exchange of Thailand's (SET) [Best Sustainability Excellence Award 2019](#)
- For the fourth 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.

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

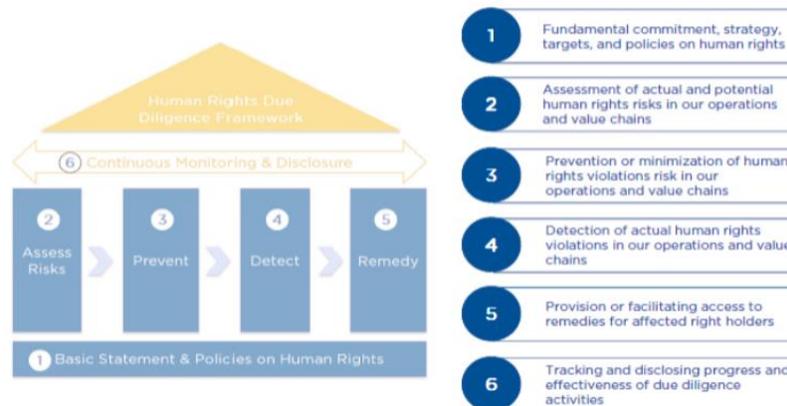
4) HUMAN RIGHTS RISK ASSESSMENT

The seafood industry is generally labor intensive and has a complex supply chain with many stakeholder groups involved. The industry faces real 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 seafood 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:

- 2015 – human rights risk assessment was conducted to help identify and visualize potential human rights risk in our **fisheries supply chain**.
- 2015 – Global consultation with internal and external stakeholders was conducted to discuss sustainability risks.
- 2016 – human rights risk assessment was conducted **for packaging, food ingredient, and shrimp supply chain in Thailand**.

In 2017, we published this information on our website to be more transparent about our management approach to human rights. While the risks and challenges associated with each step in our supply chain may vary regionally, this process will continue improving our global ability to promote human rights within our supply chains.

In particular, Thai Union identified human rights risks throughout our value chain, with a particularly high risk on board vessels and at farms and processing facilities. These include:

- Forced labor or modern slavery;
- Indebted or bonded labor arising from the use of brokers charging excessive fees;
- Lack of freedom of association or the lack of a worker voice to negotiate;
- Child labor;
- Excessive overtime;
- Unsafe and unhealthy working conditions;
- Security;
- Community health and safety in the event of major incidents from production plants; and
- Consumer health and safety.

In 2018 and 2019, we conducted two separate desk-based research 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, we repeated the desk-based research on human rights risk at a country level using a similar methodology to the previous exercise in 2018-19 but with more updated data sources. In addition, we reviewed the social audit results of fishing vessels in our supply chain. The audits were conducted by third parties against our [Vessel Code of Conduct \(VCoC\)](#) and allowed more granular understanding of human rights risks specially in our supply chain. Finally, in partnership with Verité we conducted a baseline assessment of our worker voice mechanisms in our key Thailand-based processing facilities in 2019, as part of the broader project to improve worker voice systems. The assessment results provided better and more nuanced understanding about labor rights risks in our own facilities. 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 from previous risk assessment exercises. 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, the policy states the commitment to use our commercial leverage and leadership role to address human rights issues not 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.

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.

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 seeks to work with the suppliers to resolve non-compliances as the first response to non-compliance. 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 suspension 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) Vessel Code of Conduct (VCoC) & Vessel Improvement Program (VIP)

To further mitigate the risks, including forced labor and modern slavery on the supplying vessels, we introduced [the Vessel Code of Conduct \(VCoC\)](#) in December 2017. The VCoC is an extension of Thai Union's CoC that was previously introduced in 2015 but reflects a unique set of working conditions on fishing vessels. This code will be applicable to vessels from which Thai Union sources around the world. The VCoC must be signed by suppliers before we enter into a business relationship and by all of our existing suppliers. Those suppliers who fail to adhere to the Code and engage in unfair and illegal labor practices will be asked to provide a time-bound remedial plan through the Vessel Improvement Program (VIP) or may have their contracts terminated.

Following the launch of the VCoC, in 2018 we published the [Guidance to the Thai Union 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. Subsequently in 2020, we published an updated [VCoC version 1.1](#) and corresponding [updated Guidance document](#). Audits against the VCoC are described in the sections 7.1 and 7.2 below.

5.4) 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, we have implemented a robust vessel-to-processor traceability system 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.

5.5) Policy on At-sea Transshipment & Observer Coverage

Transshipment is often linked with high risk of labor abuse including forced labor. To minimize the risk, in 2015 Thai Union introduced [a policy that bans transshipment](#) at sea in Thai and international waters in line with the Royal Thai Government Resolution and the International Seafood Sustainability Foundation Resolution. In addition, to help meet our 2020 commitments in the [Greenpeace agreement](#), we are working with partners on electronic and human observer programs for longline vessels. Our commitment and related progress on transshipment can be viewed in the latest [independent audit of progress against the Greenpeace agreement](#).

5.6) 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. Subsequently in 2017, this policy was expanded to cover all of Thai Union's facilities globally. Furthermore, in 2018 we translated the Ethical Migrant Recruitment Policy into Khmer and Burmese languages to facilitate agents' and workers' understanding of the policy.

In 2019, an [independent evaluation](#) of our Ethical Migrant Recruitment Policy was completed and published so that 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.

From 1 July 2019 to 10 July 2020, about 2,800 newly recruited migrant workers were brought into Thailand under the Ethical Migrant Recruitment Policy to work with Thai Union.

Finally, Thai Union is a global, multinational company and as such migrant workers form a significant part of the Thai Union workforce. Last year, 17-year-old Phurit Chansiri interviewed migrant workers from across the Company to explore similarities in different migration experiences, and the important role migration plays in a global business environment. The video, which can be viewed [here](#), was played at the Global Forum for Responsible Recruitment in Bangkok in 2019, where Thai Union demonstrated its effort to combat modern slavery and promote safe and legal labor throughout the Company's supply chains.

5.7) 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.

5.8) 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 investigating fairly 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.

In 2020, we expect to issue and announce a global Non-Reprisal Policy to further encourage employees and workers to openly share their concerns and make suggestions about workplaces without fear of retaliation.

6) INTERNAL ACCOUNTABILITY

6.1) Audits of Thai Union's Own Facilities

Our own 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; and Verité social capacity standards 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 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.

The 2020 audit program is currently under way.

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](#).
- **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 venue also

- provides convenient opportunities for workers to raise concerns or complaints if they are too busy to use other channels.
- **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.
- **Internal hotlines** – Thai Union employees can call site-specific hotlines to seek help, request consultation on employee relation issues or report grievances anonymously.
- **Suggestion boxes** – Each Thai Union factory in Thailand provides a suggestion box for workers to anonymously report grievances.
- **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.
- **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 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. Starting in 2016, the Migrant Worker Rights Network (MWRN) has worked with Thai Union 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](#).
- **Issara Institute's physical outreach, independent helpline, smartphone app, and social media platform** - Since 2014, we have partnered with the Issara Institute, an NGO tackling issues of human trafficking and forced labor, to improve conditions for workers in Thailand. In 2015, we provided workers with access to the Issara helpline, provided free of charge and available in five languages to accommodate migrant workers. Anyone 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 and the ports in which we operate. We have actively addressed key issues uncovered through this grievance channel. We will continue to partner with the Issara Institute and other NGOs 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 our [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.

Finally, 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 and funded by Mars Petcare, Humanity United, and the Freedom Fund. The baseline assessment of the worker voice mechanism was conducted to identify key gaps. As a result of this project, in 2020 we will issue a more robust global non-reprisal policy, a uniform standard operating procedure for handling worker voice, and standardized key performance indicators (KPIs) of worker voice channels management. The project endline assessment will be conducted in 2021-2022 to measure improvement.

7) APPROVAL & AUDITS OF SUPPLIERS

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. After the launch of the CoC/VCoC, new suppliers must acknowledge and accept the Codes before 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:

- Marine Catch Purchasing Document / Marine Catch Transportation Document
- Vessel's Port-In, Port-Out certifications (where applicable)
- Fishing Log Book (where applicable).

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](#). The next round of the VCoC audit is currently underway.

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

Similar to the seafood raw materials sourced from Thailand, we also have a process in place to ensure traceability, no IUU fishing, and no labor abuses on board vessels, for all seafood raw materials sourced outside Thailand. Before supplying to Thai Union, suppliers must provide documentation such as information available to map full chain of custody down to the vessels, National or European Union (EU) Catch Certificate, and Captain Statement. Furthermore, supplying vessels must comply with the at-sea transshipment policy described in section 5.5.

In 2016-17, we conducted external audits of the fleet supplying tuna to our European markets. The audit checked against compliance with regulations by the EU and the International Seafood Sustainability Foundation (ISSF); around IUU fishing; quality and food safety; our own sustainability policy and Business Ethics and Labor Code of Conduct (CoC).

In 2018, we began a third-party audit program of global tuna fleets in our supply chain, against the [Vessel Code of Conduct \(VCoC\)](#). From August 2018 to the end of 2019, the audits were carried out on 70 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 Annual 2019 Sustainability Report](#). For 2020, the third-party audit of tuna fleets in our supply chain will focus on vessels participating in the Fishery Improvement Projects (FIPs) which Thai Union sources from.

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. During 2016-2017, about 8 percent of the total number of suppliers received third-party audits by SGS, an auditor. In 2018, the number increased to 26 percent.

For 2019, we expanded our audit program to cover a new group of suppliers deemed potentially high-risk such as rubber gloves, soy, and sugarcane. In summary for 2019, about 12 percent of the total number of suppliers of food ingredients, packaging materials, and logistics providers in Thailand were classified as "high risk" or "medium risk" and therefore received either third-party audits against our CoC or submitted qualified social standard certifications.

The 2020 audit program is currently in progress. Finally, we will develop a policy for responsible sourcing of palm oil.

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

While Thai Union 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 2020, we plan to conduct additional audits of the vessels. I

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. By end of 2020, we aim to introduce “wild caught fish free” product in shrimp feed. Further developments to replace all Thai fishmeal in shrimp feed continue, and include use of insects, algae and other alternate proteins.

In 2019, our shrimp’s Supply Chain Development team conducted social audits of more than 570 Thai shrimp farms in our supply chain. We plan to complete similar audits of additional 60 farms in 2020. We are also implementing a new program to strengthen human rights due diligence of our entire shrimp supply chain, consisting of supply chain mapping, auditing, engagement, and capacity building.

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 for shared responsibility. 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) Sustainability Academy Training for Thai Union employees

TU conducts many different types of training for staff which touch on the topic of Modern Slavery. In 2018, the roll out of the Sustainability Academy started and continues, delivering training to different individuals within the business whether it be legal, marketing, sales etc. This aims to enable attendees to be able to discuss the Thai Union sustainability strategy and have the right level of understanding to perform in their different roles. So far, over 20 sessions have been held around the world. In addition, there are different trainings conducted targeted at increasing knowledge on Modern Slavery such as the John West mandatory 'Modern Slavery Awareness Training' course.

8.3) 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. Under the policy, successful candidates will receive training by Thai Union and the Migrant Workers Rights Network (MWRN) 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. Between 1 July 2019 and 10 July 2020, the pre-departure training were delivered to almost 2,300 newly recruited migrant workers.

8.4) Training on Labor Rights for Thai Union's Migrant Workers

We aim to prevent instances of child labor and trafficking by ensuring our migrant workers in Thailand understand their rights, through a partnership with the Labor Rights Promotion Network (LPN) Foundation, an NGO. In December 2016, Thai Union and LPN developed an educational labor rights booklet for migrant workers in the province of Samut Sakhon, Thailand. The booklet provides information on labor rights, child labor, children's rights and education, human trafficking, and emergency numbers. This community engagement program helps ensure migrant workers understand their rights under Thai law, as well as educates them about the risks of human trafficking and how to protect themselves. In 2017, LPN distributed 20,000 human rights booklets to migrant workers and organized four training sessions for migrant workers based on the contents of the booklets.

8.5) 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:

8.5.1) Food Ingredients, Packaging Materials, and Logistics Providers based in Thailand

Since 2016, we organized training on the 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 2019, about 97 percent of our critical tier-1 suppliers participated in the training.

8.5.2) Fishing vessels

In 2017, we provided an update on expectations for labor compliance and auditing to all of our international tuna suppliers through two workshops, held in Bangkok and Paris.

In 2018-19, we began to implement the [Vessel Improvement Program \(VIP\)](#) to raise suppliers' capacity to meet our VCoC standards. 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, we have held four workshops in the provinces of Pattani, Ranong, Rayong, and Chumphon, with about 300 participants who are fishers in our supply chain. 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. For the rest of 2020, we expect to hold three additional health & safety workshops.

In 2020, Thai Union aims to develop projects and partnerships to address areas for improvements that were identified in the VCoC audits such as increasing crews understanding of their employment contracts.

8.5.3) 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.

In 2018, we provided training on our Business Ethics and Labor Code of Conduct (CoC) for shrimp aggregators in our supply chain. We also have an ongoing project to raise the capacity of selected shrimp farms in achieving ASC or BAP certifications which address environmental and social responsibility, animal welfare, food safety, and traceability. In 2019, 97 shrimp farms in our program received either ASC or BAP certifications. In 2020, we expect that 83 additional farms in the program will be certified.

Recently, Thai Union, our Chicken of the Sea® brand, and Monterey Bay Aquarium launched [SeaChange® Ignite](#), a collaboration to advance new sustainability initiatives and improvements throughout the supply chain. The combined commitment for the initiative is USD \$73 million through 2025, with a focus on improvements in Southeast Asia and other key seafood producing regions. As part of the collaboration, we will work with the Monterey Bay Aquarium and the Asian Seafood Improvement Collaborative (ASIC) to improve the sustainability of farmed shrimp in Thailand and Vietnam. The project will focus on both social and environmental aspects of sustainability, including the issues of labor conditions on farms.

Further details of Thai Union's work in our aquaculture supply chain can be found in this [video](#).

8.5.4) Labor recruitment agencies

In 2018-20, we continued to focus on strengthening the implementation of our Ethical Migrant Recruitment Policy in partnership with our NGO partners and recruitment agents in our supply chain. Recently 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). Our second-party audit of the agents are expected to take place in 2020, pending travel restriction due to COVID-19 pandemic.

Finally, at the invitation of the Seafood Task Force, the recruitment agencies in our supply chain recently began to participate 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 assessment of the agents' practices against the OTL standards are expected to be completed in August 2020.

9) OTHER ACTIVITIES RELATED TO HUMAN RIGHTS

9.1) Policies and Measures to Protect Health and Safety of Employees from COVID-19

Since the onset of COVID-19 at the beginning of 2020, we have put in place strict monitoring systems and preventive measures globally to ensure that our employees are safe and healthy. Each region where Thai Union operates activated Crisis Management Team (CMT) which meet regularly and communicate with the global CMT to put in place action plans and execute them, as well as report on production and other key measurements. Regional CMTs are also responsible for keeping up to date with local government requirement and regulations and complying with them. These policies include:

- Guidelines on restricted business travel to lower risk of infection;
- Site separation policies to lower risk of cross-contamination across Thai Union work sites;
- Work from home guidelines to lower risk of infection at workplaces and to help employees work productively and maintain work-life balance in a home office setting;
- Strict worker testing and contact tracing regimes;
- Steps to be taken in the event of suspected cases among our workforce.

We also promote hygiene and sanitation practices at workplaces, workers' transportations, and workers' dormitories, such as:

- 1) Providing free reusable face masks or face shields;
- 2) Providing handwashing and alcohol gel stations in various locations of our facilities;
- 3) Educating workers on general awareness of COVID-19 through uses of workplace posters, audio/video recordings in workers' own languages. Educational materials were also shared with our migrant labor recruitment agents and partner NGOs who can help disseminate knowledge to workers in their network;
- 4) Practicing social distancing within the facilities, where we can, such as keeping a distance of 1.5-2 metres between people in canteen or waiting areas during lunch time, installing partitions between desks or dining table sets, or staggering break times to avoid overcrowding in rest areas;
- 5) Practicing social distancing in workers' transportation by increasing the number and frequency of transportation vehicles between dormitories and the factories to reduce the number of passengers per trip;
- 6) Promoting social distancing and hygiene practices in workers' shared dormitories, in collaboration with their owners, such as applying disinfectant sprays on a regular basis at the dormitories or disseminating educational videos on hygiene practices in shared rooms.

To date, we have not retrenched workers as a result of COVID-19 pandemics, enabling local and migrant workers to continue to work and earn money to provide for their families and send remittances home.

Finally, we also supported surrounding communities in addition to our workers. We donated money and/or food to NGOs, local hospitals, and relevant government authorities. This includes donations to partner NGOs that have extensive outreach to migrant workers.

9.2) Pilot project to apply blockchain technologies for workers' rights

A significant challenge in the seafood industry is tackling forced labor. The confiscation of personal documents from migrant workers such as passports or worker permits has, in some cases, been common practice.

In 2019, working in collaboration with KASIKORNBANK, a digital banking leader in Thailand, and an innovation team from Kasikorn Business Technology Group (KBTG), we developed a proof of concept trial testing the ability of

recruiters, workers, and Thai Union to store the digital signature of the personal document on blockchain. Using KASIKORNBANK's innovation platform, this was developed to capture the standard workflow procedures for recruiting agents, workers and Thai Union, which has a role in verifying the documents of migrant workers from worker home countries such as Myanmar. Through the platform, workers could store passports, work permits and other important documents on their mobile phone as electronic documents. All these documents can be verified as to who the real issuer is. The intention is to enable workers to have greater access to their personal data and be less likely to encounter bonded or forced labor through control of their own personal documents. If physical copies of their passport or work permit were confiscated, they could still access them online when authorities requested them and prove that the document is authentic.

9.3) 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. To promote children's rights to education, we established four preschools for children of our migrant and local workers in the province of Samut Sakhon, Thailand, in collaboration with the LPN Foundation. We aim to establish a fifth school by the end of 2020. The schools help the children enter into the Thai education system so they can progress to primary schools. By encourage school attendance, the preschool program also ensures safety of children during the day and discourages child labor.

Thai Union also organized key education initiatives for children at our preschools throughout the year, including a [photography workshop](#), a [fire safety workshop](#), and a series of [football clinics](#) to promote physical education.

9.4) Demonstration Boat Project

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.

The two companies, in collaboration with Verité, renovated a standard Thai fishing boat, transforming it into a modern model with improved working conditions and labor standards on board. The initiative was originally created in March 2016, supported by the Thai Ministry of Foreign Affairs (MFA), Southeast Asian Fisheries Development Center (SEAFDEC) and the Thai Department of Fisheries (DOF).

The vessel was renovated to meet standards set by the International Labour Organization's (ILO) C188 convention for human rights at sea, as well as to comply with Thailand's updated fisheries regulations. These regulations have been implemented progressively in the industry since 2015 to help secure the health, safety and welfare of seamen.

To date, we organized two training events in the provinces of Trat and Pattani to improve awareness and understanding on a wide range of topics such as ethical on-board living and working condition, using the demonstration boat as a key medium. The events were organized in collaboration with Verité, Stella Maris, Nestle, and SEAFDEC. Participants include more than 100 vessel owners, captains, aggregators, and crew supervisors that are part of Thai Union's supply chain.

9.5) Digital Traceability Pilot Program for Vessels

We believe that traceability is the backbone of sustainability. Traceability gives us the ability to wholly trace our seafood. From catch to consumption, full traceability helps us to identify, investigate and improve upon the industry's most critical issues, including modern slavery and human trafficking. In 2017, Thai Union, Mars Petcare, along with a coalition of other industry and government groups such as USAID's Oceans and Fisheries

Partnership (USAID Oceans), launched a [digital traceability pilot program](#). Inmarsat's "Fleet One" terminals were successfully installed on fishing vessels in Thailand, while the crew members, captains and fleet ownersere trained on "Fish Talk" chat applications developed by Xsense that enable them to connect with families and peers around the world while at sea – an industry first for Thai fisheries.

The pilot program tests scalable platforms for electronic Catch Data and Traceability (eCDT) systems that utilize mobile applications and satellite connectivity, making it possible to demonstrate true electronic end-to-end traceability and supply chain management.

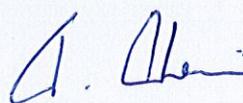
9.6) Electronic Monitoring of Vessels

Since 2018, Thai Union has been working with The Nature Conservancy to install Electronic Monitoring (EM) on board vessels in our tuna supply chain. The EM will be able to help detect illegal fishing and human rights abuses aboard the vessels, by ensuring that they are under comprehensive observation at all times. We are currently exploring a partnership with a U.S. university to trial an artificial intelligence-based monitoring system to analyse footage from the onboard cameras.

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 blue ink signature of Cheng Niruttinanon, consisting of several horizontal strokes.

Cheng Niruttinanon
Executive Chairman
Thai Union Group PCL

A blue ink signature of Thiraphong Chansiri, written in a cursive style.

Thiraphong Chansiri
CEO and President
Thai Union Group PCL

Date of Issue: 24 August 2020