

Public	
Group Compliance Policy	
Anti-Discrimination & Anti-Harassment Policy	Dated: 10 May 2021 Version: 001/2021 <hr/> Last Verification Date: 10 May 2021
Issued by: Dr. Darian McBain	
Verified by: Mr. Kulshaan Singh	
Approved by: Mr. Thiraphong Chansiri and Mr. Kulshaan Singh	
Distribution List: All Thai Union staff - all Thai Union majority owned subsidiaries	
Targeted Group: All Thai Union staff - all Thai Union majority owned subsidiaries	
Distribution Method: Online Announcement	

BACKGROUND

Thai Union Group Public Company Limited and its subsidiaries, hereafter referred to as Thai Union, supports and respects the protection of internationally proclaimed Human Rights. This Policy reflects our commitment to conducting business with integrity, openness, and respect for universal human rights, including the rights to equality and non-discrimination. The Policy is designed to create workplaces and working environment that are free of inappropriate, unfair, discriminatory behaviors.

Our Anti-discrimination & Anti-harassment Policy is part of the company's broader SeaChange® Sustainability strategy - an integrated plan of initiatives, organized into four programs to drive meaningful improvements across the entire global seafood industry. Finally, the Policy is also aligned with Thai Union's Business Ethics and Labor Code of Conduct (CoC), implemented since 2015, specifically the CoC's Principle 3 that all workers shall be treated equally and with respect and dignity.

THE POLICY STATEMENT

Thai Union shall prohibit all forms of discrimination, sexual harassment, and non-sexual harassment in Thai Union's physical workplaces and in all work-related interactions and communications regardless of where those take place. Work-related settings outside of Thai Union's physical workplaces include but are not limited to: work-related trips, work-related social activities, employer-provided housing, and employer-provided transportation. We do not tolerate any forms of discrimination and harassment.

SCOPE

The Policy is applicable to all employees of Thai Union majority owned subsidiaries and affiliates as well as any other individuals such as suppliers and customers who interact or communicate with Thai Union employees in a work-related setting. Thai Union employees shall not discriminate or harass against other employees or other individuals in all work-related settings. The vice versa shall also apply.



DEFINITION

Discrimination is defined as the act and the result of treating people unequally by imposing unequal burdens or denying benefits, instead of treating each person fairly on the basis of individual merit. Basis of discrimination can include but are not limited to: caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, sexual identity, union membership, political affiliation, health, or pregnancy. Thai Union shall allow selective treatments of individuals only when those are required by relevant local or national laws such as employment quota rules.

Harassment is defined as verbal or non-verbal behaviors and practices that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm. This potentially covers physical abuse, verbal abuse, bullying and mobbing, sexual harassment, threats and stalking, among other things.

It is important to note that discrimination and harassment may take place in online settings such as cyber bullying on the company's email or social media platforms.

SYNERGIES WITH OTHER POLICIES

This policy should be read in conjunction with Thai Union's Human Rights Policy, Business Ethics and Labor Code of Conduct, Supplier Code of Conduct, Vessel Code of Conduct, Diversity Policy, Global Non-reprisal Policy, and the Global Whistleblower and Investigation Policy.

REPORTING BREACHES

Anyone may report actual or suspected violations against this Anti-discrimination & Anti-harassment Policy confidentially to Thai Union via any one of the many reporting channels indicated here: <https://www.thaiunion.com/en/sustainability/code-of-conduct>. In addition, internal, site-specific grievance channels are available such as suggestion boxes and internal helplines.

We strongly support a culture of speaking up without any fear of retaliation against those who report actual or suspected violations, supported by our Global Non-reprisal Policy.

INVESTIGATION PROCEDURE

Thai Union takes seriously all whistleblowing and grievance reports, including allegations of discrimination and harassment, per Thai Union's Global Whistleblower and Investigation Policy. The investigation shall be conducted in a fair and balanced manner with the purpose of objectively ascertaining what transpired. All information from the investigation will be shared on a strictly need-to-know basis in order to preserve confidentiality. Relevant information shall be disclosed only to persons involved in the resulting investigation process such as witnesses, and they are also required to keep all relevant identities and information confidential. Disclosure to other persons is acceptable only when it is required by law, regulation, or court decision.

The assignee investigator, being as the case may be: local, regional or corporate Human Resources (HR) manager will take appropriate action on the basis of objective criteria to address the concerned



violation and inform the whistleblower of step(s) taken. If need be, exchanges preserving confidentiality will take place with the whistleblower.

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

Should a report reflect a discrimination or harassment concern relating to an individual mentioned above (for example, a member of HR team, etc.), such individual will not be allowed to investigate the case.

Following fair and transparent investigation, Thai Union's employees who are found to have practiced discrimination or harassment may be subjected to disciplinary action up to and including termination of employment. For any other individuals such as suppliers and customers who are alleged or found to have practiced discrimination or harassment against Thai Union's employees, Thai Union reserves the rights to report such allegations to relevant authorities or organizations that they represent.

Approved by

A handwritten signature in blue ink, appearing to read "T. Chansiri".

(Mr. Thiraphong Chansiri)
President & CEO

A handwritten signature in blue ink, appearing to read "Kulshaan Singh".

(Mr. Kulshaan Singh)
Group Director, Human Resources

Dated: 10 May 2021