



<b>Public</b>	
<b>Group Compliance Policy</b>	
<b>Human Rights Policy</b>	<b>Dated: 24 July 2023</b> <b>Version: 003/2023</b> <b>Last Verification Date: 24 July 2023</b>
<b>Issued by: Adam Brennan</b>	
<b>Verified by: Prad Kerdpairoj</b>	
<b>Approved by: Mr. Thiraphong Chansiri and Mr. Kulshaan Singh</b>	
<b>Distribution List: All Thai Union staff – all Thai Union majority owned subsidiaries</b>	
<b>Targeted Group: All Thai Union staff – all Thai Union majority owned subsidiaries</b>	

## **OUR COMMITMENT TO RESPECT HUMAN RIGHTS THROUGHOUT OUR VALUE CHAIN**

Thai Union Group Public Company Limited and its subsidiaries, hereafter referred as Thai Union, supports and respects the protection of internationally proclaimed Human Rights. This Policy embodies our commitment to conducting business with integrity, openness, and respect for 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, namely Freedom of Association and the right to collective bargaining, elimination of all forms of forced labour, effective abolition of child labour, elimination of discrimination in respect of employment including through ensuring equal remuneration for equal work, and a safe and healthy working environment.

This Policy also reflects our commitment to non-discrimination against, as well as to respect the rights of, people in vulnerable groups, such as children, women, persons with disabilities, and workers, including women and migrant workers. In addition, we respect the rights of customary resource users and the rights of indigenous people as set out in the United Nations Declaration on the Rights of Indigenous Peoples. 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, in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We also have zero tolerance on human trafficking, child labor, and forced labor in our operations and supply chain, and will continue to do our utmost and work with our stakeholders to prevent these labor malpractices.

Our commitment to respect human rights is part of the company’s SeaChange® 2030, a sustainability plan to help reshape the seafood industry with solutions for People and Planet that better sustain a future for all. We also recognize that human rights and the UN Sustainable Development Goals (SDGs) are interrelated and mutually reinforcing, and our efforts to respect human rights contribute to the realization of the 2030 Agenda for Sustainable Development.



## **OUR COMMITMENT ON HUMAN RIGHTS FOR THE GLOBAL SEAFOOD INDUSTRY**

Thai Union’s mission is to be a 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 will use our commercial leverage and leadership role to address human rights issues not only in our value chain but also to inspire positive changes in the broader global seafood industry.

### **SCOPE OF THE POLICY**

The Policy extends to all individuals whose lives and rights may be negatively impacted by our operations, products, or services. Those operations covers existing business activities by our subsidiaries, associated companies, and joint ventures, as well as new business relations in which we enter. Relevant rights holders include but are not limited to our employees, contractors, suppliers, partners, customers, consumers, or people living in communities around the area where we operate.

Through the “Safe, Decent, and Equitable Workplace” pillar of SeaChange®, we focus our efforts on addressing the rights of workers employed in our facilities and in our supply chain. Our human rights risk assessment to date identifies risks associated with employment and workplaces as key salient human rights risks.

### **IMPLEMENTATION OF THE POLICY**

To translate this Human Rights Policy into practice, we have designed and continuously implemented our Human Rights Due Diligence Framework comprising six pillars, namely:

- 1) **Basic Statement & Policies on Human Rights** – we commit to set a specific strategy and measurable targets on human rights as well as policies to achieve them. Example of policies include Thai Union’s Business Ethics and Labor Code of Conduct and Vessel Code of Conduct.
- 2) **Assess Risks** – we commit to assess actual and potential risks of human rights violations linked to our operations and value chains.
- 3) **Prevent** – we commit to implement policies and measures to prevent or minimize risks of human rights violations in our operations and value chains.
- 4) **Detect** – we commit to implement 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.
- 5) **Remedy** – we commit to provide remedies or facilitate access to remedies to affected rights holders in the case where we cause or contribute to the adverse human rights impacts.



6) **Continuous monitoring & Disclosure** – we commit to measure and disclose progress of our human rights’ due diligence activities and their impact to ensure that we achieve the intended outcome and share lessons learned with stakeholders.

Further details about activities in our Human Rights Due Diligence Framework can be found [here](#).

Wherever applicable, we will consult relevant rights holders, their representatives and seek guidance from existing global standards and best practices. We will also collaborate with civil society organizations, labor unions, government authorities, or industry partners.

#### **SYNERGIES WITH OTHER POLICIES**

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

#### **RESPONSIBILITIES & REPORTING**

This Policy is overseen by the Board of Directors through the Sustainability Committee, chaired by Thai Union Chief Executive Officer and co-chaired by the Global Director of Corporate Affairs and Sustainability. The Sustainability Committee brings together team members across functions and locations throughout the world to ensure aligned implementation of the policy across all relevant business units and geographies. The Global Director of Corporate Affairs and Sustainability is also a member of the Global Leadership Team and the Risk Management Committee to ensure there is a direct link between sustainability issues including human rights and the Board.

We aim to be transparent on our human rights performance through regular public disclosure and open engagement with the public. We publicly disclose progress and the impact of our human rights due diligence activities through Thai Union’s Annual Report, Annual Sustainability Report, the UK Modern Slavery Act Transparency Statement, and the California Transparency in Supply Chain Statement. We will also provide updates on key activities & initiatives for each pillar of the human rights due diligence framework. Finally, we disclose progress on our [SeaChange® website](#), at conferences and public forums, and other news releases on specific activities.

#### **REPORTING BREACHES**

Anyone, including internal stakeholders as well as external affected individuals and communities, may report actual or suspected human rights violations linked to our operations and value chains 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 to internal reporting channels, we also maintain external reporting channels such as *Speak Out - Thai Union Compliance Reporting Hotline* in partnership with Navex. The Platform can be accessed here: [thaiunion.ethicspoint.com](http://thaiunion.ethicspoint.com) In addition, we work with an independent NGO, Issara Institute, to



maintain a grievance mechanism for workers' complaints in our Thailand-based operations. We strongly support a culture of speaking up without any fear of retaliation against those who report actual or suspected violations.

This Human Rights Policy is updated on 2 May 2021. The first version of the Policy was issued on 24 May 2018. Thai Union reserves the right to amend this policy at any time.

Approved by

A handwritten signature in black ink, appearing to be "T. Chansiri", written over a horizontal line.

(Mr. Thiraphong Chansiri)  
President & CEO

A handwritten signature in blue ink, appearing to be "Kulshaan Singh", written over a horizontal line.

(Mr. Kulshaan Singh)  
Group Director, Human Resources  
Dated: 24 July 2023