



Thai Union Group PCL

**Safety, Occupational Health, and
Environment (SHE) Management
Framework**

INTRODUCTION

Background

Thai Union owns and operates businesses in different countries and cultures around the world that may affect the health and safety of people, the environment or communities. Thai Union has a commitment to operating the business sustainably. Hence, an effective management of Safety, Occupational Health and Environment issues (SHE) is required for business activities throughout the organization. Thai Union has established a Safety, Occupational Health and Environment (SHE) Management Framework that forms the basis of the development and application of the SHE management system at all levels at Thai Union.

Application

These SHE Protocols interpret and support the SHE Policy and apply to Thai Union sites and operations around the globe. These include:

- Majority owned and/or operated and controlled facilities and activities (from raw material sourcing through production until delivery to customer);
- Development projects, mergers, acquisitions and divestments; and
- Activities performed by contractors at Thai Union sites or under Thai Union management.

Newly acquired businesses or assets are expected by Thai Union to apply and comply with the SHE Protocols within two years. Where Thai Union does not have operational responsibility but has an equity stake, or where significant Thai Union assets are involved, this framework is made available to the site, so that comparable SHE management standards may be applied.

THAI UNION'S SHE POLICY



Safety, Health and Environment Policy

At Thai Union, we value Safety, Health and Environment (SHE) as a key pillar of our operational excellence strategy, which contributes to sustainable harmonization between our operations, our employees, the environment and society. Our operations shall be designed to build a trusted and safe workplace as well as proactively act against climate change and other adverse environmental impacts.

- Culture: we will systematically integrate SHE considerations into every business decision to make a real positive improvement towards a safe workplace, the community and the environment. This includes empowering our employees and stakeholders to recognize the SHE impacts of their work activities and the impact of the Company's mitigation initiatives via effective competency training, communication, and assurance.
- Compliance: we will be fully accountable for compliance with applicable SHE legislations, customer requirements, and appropriate international standards and guidelines.
- Captivation of perspectives and Consultation with stakeholders: we shall capture the viewpoints and experience of our employees, contractors, customers, suppliers, communities, and other stakeholders, as we believe the best SHE strategy, priorities and practices incorporate a broad range of perspectives.
- Continual Improvement: Our measurable SHE targets shall always reflect our ambition to be the seafood industry's leading agent of change. We shall continually monitor and review our SHE performance against the targets set as well as benchmark ourselves with stakeholders' expectations and industry best practices for continual SHE performance improvement.

This policy applies to all Thai Union operations, including our subsidiaries. All employees, particularly management, shall demonstrate leadership and be accountable for policy alignment. All employees and contractors under Thai Union's supervisions are obligated to understand and ensure compliance with this policy throughout all work activities.



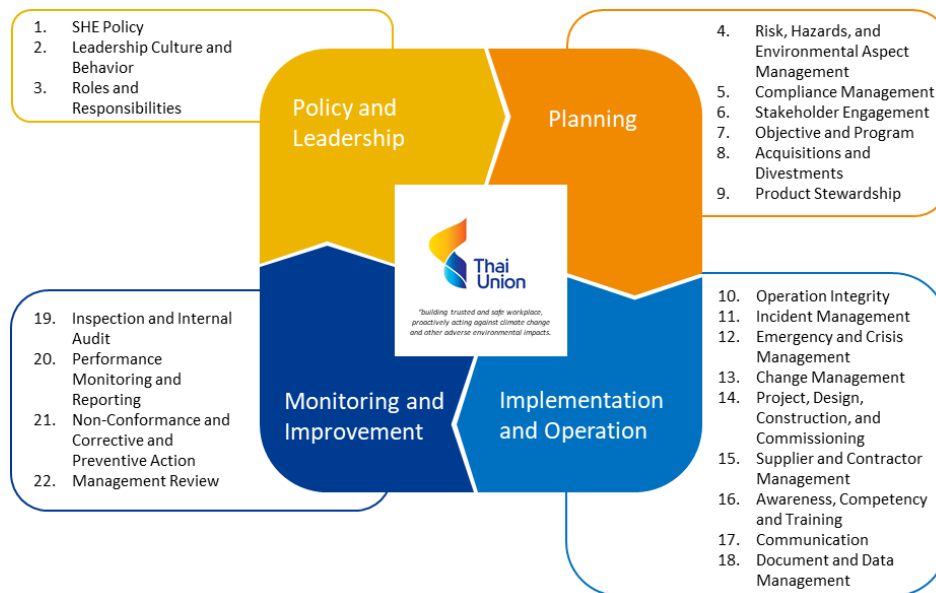
Mr. Cheng Niruttinanon
Chairman of Executive Committee



Mr. Thiraphong Chansiri
President and CEO

OVERVIEW OF SHE Framework

The framework of the Group SHE Protocols is based on the systematic continual improvement concept. The figure below illustrates how these elements drive the performance improvement.



In order to support the implementation of the SHE Management Framework, there will be a set of SHE Guidelines to provide guidance for the sites with a step-by-step procedure in addressing each specific SHE topic according to the risk, hazard and environmental impact. The SHE Guidelines comprise four main components: Process and Equipment Integrity, Human Well-Being, Environmental Stewardship, and Product Stewardship. All sites are expected to develop and implement their own documented procedures to be in accordance with each SHE Guideline. The sites may adopt the Group SHE Guidelines where the nature of the business, activities and SHE issues are aligned as appropriate. The list of Group SHE Guidelines includes, but is not limited to, the following:

Process and Equipment	Human Well-Being	Environmental Stewardship	Product Stewardship
<ul style="list-style-type: none"> • Engineering design for process and infrastructure • Construction and commissioning management • Process and plant operation • Plant preventive maintenance 	<ul style="list-style-type: none"> • Permit to work • Confined space • Hot work • Lifting and rigging • Work at height • Electrical safety • Machinery safety • Hazardous energy isolation • Fire safety • Diving and work in/near water • Work in cold room • Industrial hygiene • Ammonia safety • Radiation • Medical surveillance • Personal protective equipment • Safety culture assessment • Safety leadership program • Behavior-based safety program 	<ul style="list-style-type: none"> • Air emission control • Wastewater management • Waste management • Hazardous materials management • Water scarcity management • Water conservation • Energy and greenhouse gas management • Biodiversity 	<ul style="list-style-type: none"> • Life cycle impact analysis • Research, design and development of product • Product labeling and claim

Intent of Element

SHE POLICY

A clear framework for setting the objectives and leading to the effective management of safety, health and environment performance consistently with the Group SHE Policy is established.

LEADERSHIP, CULTURE AND BEHAVIOR

Leaders at all levels visibly demonstrate continuing commitment and behaviors toward excellence in SHE management and performance, supporting the reinforced SHE culture in the organization.

ROLES & RESPONSIBILITIES

Sufficient resources and clear responsibility and accountability are allocated and defined to employees, suppliers and contractors to support effective SHE management toward continuous performance improvement.

RISK, HAZARD, ENVIRONMENTAL ASPECT MANAGEMENT

SHE risks, hazards, and environmental aspects associated with Thai Union operations shall be assessed for proper mitigations

COMPLIANCE MANAGEMENT

All relevant SHE legislations, requirements, standards and codes are identified and complied with throughout the design, construction and operations phases.

STAKEHOLDER ENGAGEMENT

Stakeholders and parties interested in the business entity are identified and prioritized. Engagement programs are developed and implemented to ensure their concerns and interests are taken into account.

OBJECTIVE AND PROGRAM

SHE objectives and measurable targets are established and coherent action plans are defined and implemented to manage SHE risks and opportunities based on their priorities. Performance is continually monitored and evaluated for improvement.

ACQUISITION AND DIVESTMENT

SHE risks and liabilities are considered and evaluated as part of the merger, acquisition and divestment process to be part of the key factors in business decision making.

PRODUCT STEWARDSHIP

SHE impacts associated with product and service throughout its life cycle are identified, minimized, managed and further leveraged in the development of new products, factoring in sustainability enhancement.

OPERATIONAL INTEGRITY

The SHE risks associated with activities related to business operations are properly managed and comply with the relevant SHE regulatory requirements and industry best practices.

INCIDENT REPORTING AND INVESTIGATION

SHE incidents are timely reported, investigated, properly managed and shared across Thai Union to prevent recurrence and to improve SHE performance.

EMERGENCY AND CRISIS MANAGEMENT

Reasonably foreseeable emergencies are identified, appropriate response measures are planned and adequate intervention equipment is provided to minimize or mitigate any adverse SHE impacts.

CHANGE MANAGEMENT

SHE risks and other impacts from are identified and appropriately managed when planned and unplanned changes are made.

PROJECT DESIGN, CONSTRUCTION AND COMMISSIONING

SHE risks are managed and reduced as an integral part of all projects through design, approval, construction and commissioning.

SUPPLIERS AND CONTRACTOR MANAGEMENT

The management of SHE risks associated with goods, services, distribution and logistics provided by contractors and suppliers is carried out to minimize any adverse SHE consequences. This includes integration of

SHE risks and environmental aspects into selection process.

AWARENESS, COMPETENCY AND TRAINING

Employees and personnel working for, and on behalf of, Thai Union are aware of SHE requirements, hazards, risks and controls and are competent to perform their activities in a responsible manner.

COMMUNICATION

Effective and transparent communication to internal and external stakeholders is carried out to encourage participation in and contribution to SHE performance improvement initiatives.

DOCUMENT AND DATA MANAGEMENT

SHE related information is managed and controlled to demonstrate its traceability and to ensure that information is accessible and up-to-date.

INSPECTION AND AUDIT

SHE performance systems are verified and evaluated periodically, and either internally or externally, to assess conformance and drive continual improvement.

PERFORMANCE MONITORING AND REPORTING

SHE performance is measured and monitored periodically to drive continual improvement.

NON-CONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION MANAGEMENT

SHE non-conformities are properly managed through implementation of preventive and corrective actions to avoid recurrence.

MANAGEMENT REVIEW

Overall, SHE programs and performance are reviewed by management to ensure the achievement of the desired outcomes and provide necessary support as required.