



# Thai Union Deforestation and Conversion Free Policy

## 1. Introduction and context

Forests are vital ecosystems that support rich biodiversity, regulate the global climate, and provide essential resources and livelihoods for millions of people around the world. They play a crucial role in carbon sequestration, water cycle regulation, and soil protection, making them indispensable in the fight against climate change. Deforestation and ecosystem conversion, however, pose significant environmental threats, including loss of biodiversity, increased greenhouse gas emissions, and disrupted ecosystems. Beyond environmental impacts, these practices often lead to social harm, such as the displacement of Indigenous Peoples and local communities, violations of human rights, and the undermining of communities' cultural and economic well-being.

Thai Union, as a leader in the seafood processing business, is committed to sourcing materials in an ethical, legal, and environmentally and socially responsible manner in line with our SeaChange 2030 Strategy. Thai Union has identified the key agricultural and forest-based raw materials in our supply chain that can pose risks for deforestation and conversion. We aim to eliminate deforestation and ecosystem conversion from our supply chain. This policy explains our commitment and how we plan to work with our suppliers and critical stakeholders to achieve this goal by the target date.

This Policy is to be applied together with Thai Union's Human Rights Policy, Supplier Business Ethics and Labor Code of Conduct, Agricultural Raw Material Sourcing Guidelines, General Responsible Sourcing Guidelines, and Responsible Sourcing of Palm Oil Policy.

## 2. Scope of commitment (operations and commodities)

This Policy applies to all Thai Union's global operations, including subsidiaries, as well as our entire supply chain—both direct and indirect suppliers—and covers the raw material supply chains for our highest deforestation and conversion risk agricultural and forest-based commodities: Palm Oil, Soy, Soy embedded in shrimp feed, and Pulp & Paper-based packaging.

## 3. Overall commitment and target

This Deforestation and Conversion Free Policy supersedes Thai Union's 2021 No Deforestation Policy. The palm oil and soy related commitments in this policy supersede those in Thai Union Feedmill's 2024 No Deforestation and Conversion Policy.

**Thai Union commits to eliminate deforestation and conversion from our highest risk agricultural and forestry supply chains by 2030.**

We aim to do this by working with our direct and indirect suppliers to ensure they are supplying volumes of in scope materials that comply with the commodity specific requirements set out in this Policy, as well as with our Business Ethics and Labor Code of Conduct.

Thai Union will follow industry aligned deforestation and conversion free methodologies for agricultural commodity sourcing adopted by the Consumer Goods Forum Forest Positive Coalition (CGF-FPC) and Accountability Framework Initiative (AFI).

Thai Union will implement its deforestation and conversion free due diligence approach by:

- a. Improving supply chain transparency and traceability.
- b. Assessing deforestation risk of sourcing regions.
- c. Addressing deforestation and conversion for our physical volumes through a combination of sourcing certified volumes, sourcing volumes through a supplier control mechanism, engaging suppliers to continuously address & prevent deforestation and conversion linked to Thai Union's supply chain, and working collaboratively at a sector level to address systemic issues and to develop sector-wide solutions.
- d. Monitoring cases of non-compliance in our supply chain and using our grievance mechanism to take action and support remediation measures where applicable.
- e. Regularly monitoring and reporting on progress against our commitments through responsible sourcing and deforestation KPIs.

Thai Union recognises that deforestation and conversion is a systemic issue that requires a collaborative approach across sectors and supply chains. Therefore, we are committed to work collaboratively in supporting forest conservation and restoration activities across our sourcing landscapes linking to our 2030 Global SeaChange commitment to Ecosystem Restoration. We are committed to supporting our suppliers in transitioning to entirely deforestation and conversion free operations across their entire business, not just in the volumes they supply to us (see specific requirements below).

Thai Union also recognises that addressing commodity-driven deforestation and conversion is linked to broader social and human rights issues. In alignment with our commitments under the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, we expect all suppliers to uphold international human rights standards, including respecting farmers' and local communities' land rights, and protecting the rights of Indigenous and forest-dependent peoples through Free Prior and Informed Consent (FPIC) procedures, and ensure that operations do not cause to unresolved land tenure disputes or rights infringements.

**Commodity-specific requirements**

To implement and demonstrate progress to our commitments, Thai Union will follow a set of commodity specific guidance to deliver on its deforestation and conversion free supply chains.

### **Soy and embedded soy**

We will work towards sourcing 100% deforestation and conversion free by 2030 for all directly procured soy products and the embedded soy in the feed in our shrimp supply chain. Thai Union expects its suppliers to supply soy (or use soy feed in the case of shrimp) that:

- Originates from legal sources.
- Is deforestation and conversion free with a cut-off date of December 31 2020 or earlier when law or sectoral agreements determine.
  - If soy originates from Amazon biome, the cut-off date is July 2008, as aligned with the Amazon Soy Moratorium.

We recognize the importance of addressing deforestation and ecosystem conversion risks across all feed used in our aquaculture and livestock supply chains and will work towards expanding our approach to other aquaculture and livestock supply chains.

### **Palm oil**

We will work towards sourcing 100% deforestation and conversion free palm oil by 2030. Thai Union expects its suppliers to source palm that:

- Originates from legal sources.
- Is deforestation free with a cut-off date of 31 December 2015 or aligned with RSPO.
- Is not associated with the conversion of peatlands after the cut-off date of 31 December 2015 or aligned with RSPO.
- Is not associated with conversion of high conservation value (HCV) areas and high carbon stock (HCS) forests.
- Is not associated with burning in preparation of plantings.

### **Pulp & paper-based packaging**

We work towards sourcing 100% deforestation and conversion free pulp & paper-based packaging by 2030. We also commit to avoid sourcing pulp & paper-based packaging from degraded areas. This includes all primary, secondary and tertiary fiber-based packaging Thai Union and its subsidiaries purchase. Thai Union expects its suppliers to source pulp & paper-based packaging that:

- Originates from legal sources.
  - Does not originate from expansion or production on areas converted from natural forests and other natural ecosystems after commodity sectoral cut-off dates where they exist, but in no case later than 31 December 2020.
  - Is not associated with conversion of high conservation value (HCV) areas.
  - To avoid sourcing from degraded areas.
  - Is made from recycled fibre, when available.

## **4. Remedy & Grievance Mechanisms**

Thai Union encourages anyone who has a concern with practices that are not in line with our policies to report them. Our grievance mechanisms include Speak Out, operated and in partnership with Navex, which can be accessed here: [thaiunion.ethicspoint.com](http://thaiunion.ethicspoint.com). It allows anonymous reporting of any business ethics or policy violation, including environmental and land-use concerns. This is available in multiple languages and is accessible to workers and other internal and external stakeholders throughout our global supply chain. We strongly

support a culture of speaking up without any fear of retaliation against those who report actual or suspected violations, and this is institutionalized by our No Reprisal Policy.

Where cases of non-compliance with the commitments above have occurred in our supply chains, we commit to providing for or supporting in effective restoration and/or remediation. If a supplier is not compliant with our commitments and/or not cooperating in ensuring remediation we reserve the right to suspend or remove the supplier, for affected individuals or groups.

## 5. Governance

Thai Union's Group Non-Fish & Indirect Procurement will be responsible for implementing this Policy and due diligence approach in the Group's operations and embedding into our supply chains. The Group Sustainability team will be responsible for strategic oversight of this Policy and due diligence approach and supporting in the implementation plans.

## 6. Definitions aligned with AFI (e.g. deforestation, conversion, cut-off dates)

Thai Union is aligned with the definitions of key terms and concepts as defined by the [Accountability Framework Initiative](#), the [High Conservation Value Approach](#), and the [High Carbon Stock Approach](#)

**Conversion** Loss of a natural ecosystems caused by:  
a) Change of land use (to agriculture or other use)  
b) Significant and sustained change in a natural ecosystems' species composition, structure or function

Conversion includes deforestation (i.e. conversion of natural forests), severe and sustained degradation, and the introduction of management practices resulting in significant and sustained change in an ecosystems species composition, structure, or function.

This definition applies regardless of whether the conversion is legal or not.

**Cut-off date** The date after which deforestation or conversion activities are not allowed within the supply chain. Any area or production unit with any occurrence of deforestation or conversion after this date will be considered non-compliant with DCF commitments, policies, goals and targets.

**Deforestation** The loss of a natural forest resulting from:  
a) Conversion of land to agriculture or other non-forest land use  
b) Conversion of land to tree plantation  
c) Severe and sustained degradation of land

This definition applies regardless of whether the deforestation is legal or not.

<b>Degradation</b>	Changes within a natural ecosystem that significantly and negatively affect its species composition, structure, and/or function and reduce the ecosystem's capacity to supply products, support biodiversity, and/or deliver ecosystem services.
<b>Direct and Indirect suppliers</b>	Direct suppliers are those from whom Thai Union sources raw materials or ingredients directly, while indirect suppliers refer to upstream third-party suppliers, including those providing feed products to farms or raw materials to processors further up the chain.
<b>Free, prior, and informed consent (FPIC)</b>	Indigenous peoples and local communities (IP & LC) collective human right to give and withhold their consent ahead of the start of any activities that may impact their rights, livelihoods, land, territories, resources and food security.
<b>High Carbon Stock</b>	High Carbon Stock (HCS) forests are ecologically and socially viable forest areas that should be protected. These forests identified through the High Carbon Stock Approach methodology are the ones important to local communities, or having high carbon storage capacity or biodiversity values.
<b>High Conservation Value</b>	High Conservation Value (HCV) areas host biological, ecological, social or cultural values of outstanding significance or critical importance deemed for conservation. These areas are identified through the application of the High Conservation Value approach.
<b>Remediation/ Remedy</b>	The process of providing reparations for a negative impact and the substantive outcomes which can offset or negative impacts. These outcomes can include apologies, restitution, restoration, rehabilitation, compensation (financial or non-financial), guarantees of non-repetition and punitive sanctions.

Approved by



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