

## UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2023

This statement is written in compliance with the requirements under the UK Modern Slavery Act 2015, with reference to Section 54; Transparency in Supply Chains.

The purpose of this statement is to describe efforts by Thai Union Group PCL (TU) to prevent, detect, and facilitate or provide remedy for negative human rights impacts, particularly in relation to modern slavery within our operations and supply chains. The statement covers key activities and progress in 2023 up until March 2024. In this statement, we also highlight key policies and initiatives that were established prior to 2023 but are still active during the reporting period. To understand our previous activities related to modern slavery, please refer to the previous updates of the Statement available on our [Thai Union website](#).

In summary, key highlights of recent activities and achievements for enhancing our due diligence on modern slavery and forced labor are:

- Launching our updated Sustainability Strategy [SeaChange® 2030](#), which includes [renewed commitment, goals, and action plans to provide a safe, decent, and equitable workplace](#);
- Issuing the third update of the [Vessel Code of Conduct \(VCoC\) version 3.0](#) to [drive improvements in the fishing sector towards meeting Sustainable Supply Chain Initiative \(SSCI\)-recognized standards](#) in collaboration with the CEO-led Consumer Goods Forum (CGF);
- Publishing our action plans and key areas of improvements to drive social compliance performance of fishing vessels in our supply chain in the [2022 Annual Sustainability Report](#);
- Compensating over 5,000 Myanmar migrant workers for the adverse human rights impacts experienced during their migration journey following the human rights due diligence assessment conducted by the International Organization for Migration (IOM)
- Strengthening due diligence and the process for screening in-country 'walk-in' job applications to minimize risk of debt bondage for our Thailand-based operations;
- Launching a self-assessment of TU's current recruitment practices against ethical recruitment standard including the "Employer Pays Principle" (EPP), with the goal of announcing a Group-wide Ethical Recruitment Policy in 2024;
- Piloting two independent and anonymous worker surveys at our Thailand-based processing sites. The surveys aim to capture forced labor risks, ethical recruitment practices, and workers' satisfaction with employment conditions;
- Enhancing human rights risk assessment at the fishery level by trialing a Fishery Level Assessment in Alaska, Estonia, Portugal, and Latvia;
- 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 Group PCL is the world's seafood leader, bringing high quality, healthy, tasty and innovative seafood products to customers across the world for 47 years.

Today, Thai Union is regarded as one of the world's leading seafood producers and is one of the largest producers of shelf-stable tuna products with annual sales exceeding THB 136.2 billion (US\$ 3,912 billion) and a global workforce of more than 44,000 people who are dedicated to pioneering sustainable, innovative seafood products.

The Company's global brand portfolio includes market-leading international brands such as Chicken of the Sea, John West, Petit Navire, Parmentier, Mareblu, King Oscar, Hawesta, and Rügen Fisch, Thai-leading brands SEAELECT, Fisho, Qfresh, Monori, OMG Meat, Bellotta and Marvo, and ingredient and supplement brands UniQ®BONE, UniQ®DHA and ZEAvita.

With a commitment to "Healthy Living, Healthy Oceans," Thai Union is proud to be a member of the United Nations Global Compact, a founding participating company of the International Seafood Sustainability Foundation (ISSF), and current Chair of Seafood Business for Ocean Stewardship (SeaBOS).

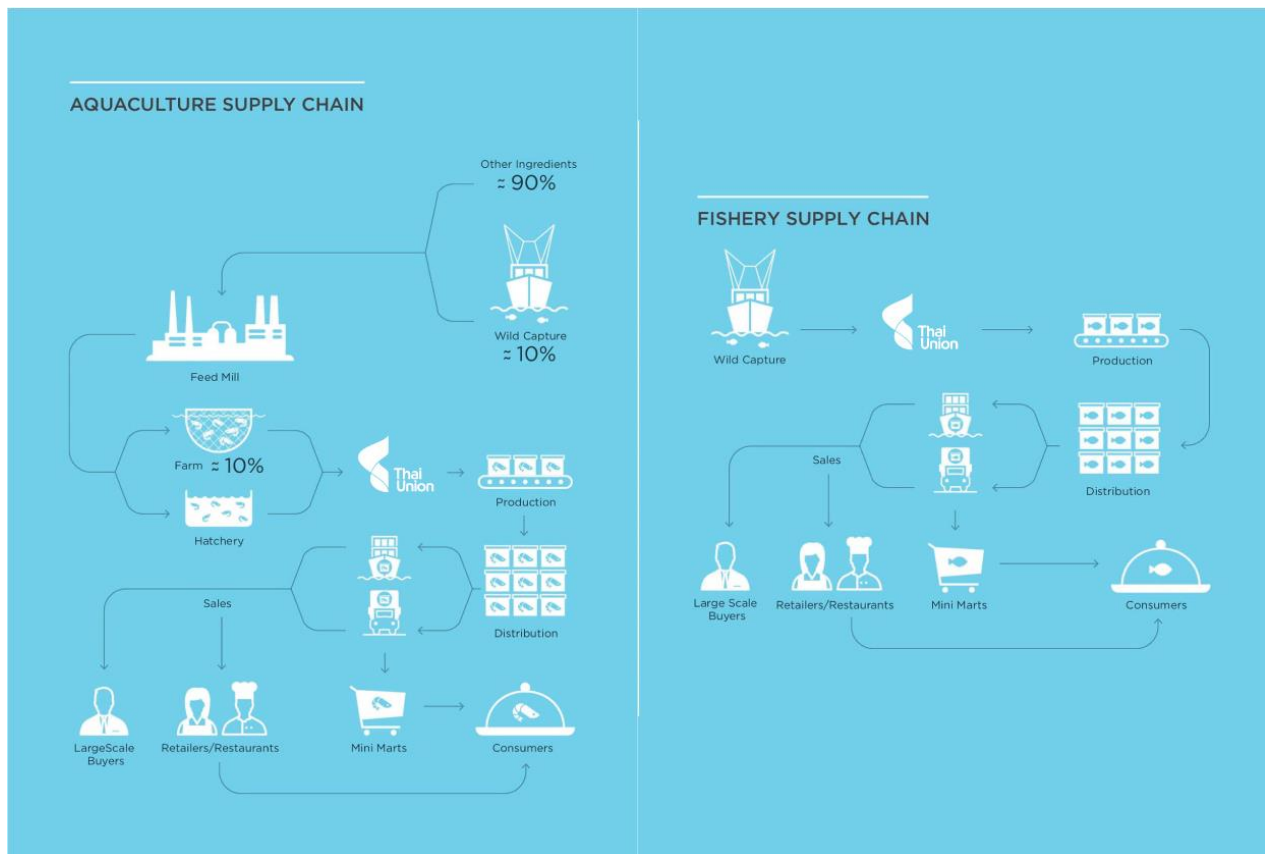
Thai Union's ongoing leadership in sustainability has been taken to the next level with the announcement of SeaChange® 2030, the Company's expanded sustainability strategy with more ambitious goals for people and planet. Through SeaChange®, the Company was recognized and listed on the Dow Jones Sustainability Indices (DJSI) for the 10th consecutive year in 2023, ranked number one on the Seafood Stewardship Index (SSI) for the third consecutive time, listed in the S&P Global Sustainability Yearbook 2024, achieved a B rating from global environmental disclosure non-profit CDP, and was also named to the FTSE4Good Emerging Index for the eighth straight year in 2023. Find out more about the Group's sustainability strategy at [seachangesustainability.org](https://seachangesustainability.org).



## 2) THAI UNION'S SUPPLY CHAINS

Thai Union sources from six main categories of seafood: tuna, shrimp, salmon, sardine, mackerel, and cephalopod. Thai Union is a processor and does not own any fishing vessels but owns a very small number of aquaculture farms. Seafood raw materials are therefore sourced from suppliers from oceans and aquaculture operations around the world. Thai Union relies on trusted relationships and dialogue to drive improvements in practices.

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



In 2020, as part of our continued commitment to transparency, we took part in the [Ocean Disclosure Project \(ODP\)](#), a global platform launched in 2015 by the Sustainable Fisheries Partnership to allow seafood companies – including retailers, suppliers and fish feed manufacturers – to publicly share the sourcing of their wild-caught seafood. Thai Union included both its wild-caught and farmed seafood sourcing details. This was first completed in 2021.

In 2022, Thai Union [entered into a partnership with Sustainable Fisheries Partnership \(SFP\)](#) to further improve transparency in the Company's supply chains and consider wider impacts on biodiversity. The partnership with SFP also allows Thai Union to continue and deepen its participation in the ODP (which SFP manages), with sustainability information to be made publicly available through the platform. SFP's Seafood Metrics allow Thai Union to continue to improve the monitoring, transparency, and traceability of its supply chains, as well as assess and monitor its global wild and farmed supply chains used in its businesses in the EU, U.S., and Asia. Seafood Metrics aggregates and tracks information on governance quality, target stock health, human rights risks, and environmental impacts in a company's source fisheries. Additional sustainability indicators, such as certifications, Human Rights Risk Assessment, NGO ratings and traceability are included in the monitoring.

In addition to seafood raw materials, Thai Union also sources a variety of food ingredients, packaging materials, and logistic services from suppliers based in the countries where Thai Union operates.

### 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 and labor rights abuses, including modern slavery and human trafficking within the seafood industry globally.

#### 3.1) SeaChange® 2030 Strategy

Our policies on human rights, including modern slavery and human trafficking, and broader sustainability areas are guided by [SeaChange® 2030](#) – our sustainability strategy, designed to help reshape the seafood industry with solutions across people and planet that better sustain a future for all. SeaChange® 2030 marks a significant expansion of the Company's sustainability strategy, first created in 2016. One of the commitments under SeaChange® 2030 is “Safe, Decent, and Equitable Work”.



**seaCHANGE 2030**  
SeaChange® 2030 is our sustainability plan to help reshape the seafood industry with solutions for People and Planet that better sustain a future for all.

**SAFE, DECENT, AND EQUITABLE WORK**  
Provide a safe, decent, and equitable workplace by ensuring 100% of the vessels and farms that we source from meet current industry best practices in welfare and working conditions. Within our operations, 50% of management positions are held by women.

**GLOBAL URGENCY**  
Safe, decent, and equitable work are the foundational building blocks for any successful business. This includes, but is not limited to fair wages, employment security, health and safety, non-discrimination, equal opportunity, and respect for workers' rights.  
Workers in the seafood industry deal with long hours, dangerous work environments, and limited access to medical facilities. Many maritime safety standards exclude fishing vessels, which can leave up to 15 million workers onboard susceptible to unfavorable working conditions or worse: forced labor while trapped at sea. In addition, workers, predominantly migrants, face discrimination with little to no consequence for those responsible.  
Women represent up to 50% of all seafood workers, but primarily work in low-skilled, low-paid, and low-valued positions. Businesses that actively support gender equality make better decisions up to 37% of the time, and those that show a commitment to gender diversity tend to attract and retain better talent. When companies protect workers and invest in equitable solutions, communities prosper, and business ultimately thrives.

**INTEGRATED APPROACH**  
Thai Union continues to advance our efforts to improve the lives and livelihoods of all workers by providing safe and decent work within our own operations and only sourcing from suppliers that are committed to improving working conditions in line with current industry standards. This incorporates changes to employment practices such as responsible recruitment, access to worker voice mechanisms, equal opportunity practices, occupational health and safety, and supply chain traceability.  
Although Thai Union does not own any vessels, it is our responsibility to ensure the vessels and farms we source from are free from any exploitation or mistreatment. Thai Union continues to work with suppliers to understand the supply chain and implement effective and lasting improvements. We are embarking on a profound commitment to drive forward labor rights advancements across our entire global operations, from upstream to downstream, working to ensure the well-being and dignity of our workers and our suppliers' workers at every stage.

**SEACHANGE® COMMITMENT**  
100% of the vessels and farms we source from are a safe and decent workplace by 2030.  
50% management positions within our operations are held by women by 2030.  
Work towards a diverse and inclusive workplace.  
Reduce the lost time injury frequency rate to 0.15 and strive towards zero accidents and injuries across our global operations.

**ACTION PLAN**  
**Responsible recruitment**  
Ensure responsible recruitment by implementing Employer Pays Principles across our own global operations  
Continue to work with industry partners to advance responsible recruitment in the global seafood industry  
**Suppliers - vessels & farms**  
We will implement Thai Union's Code of Conduct with our suppliers and make sure the work and welfare conditions are met or are improving to be met for 100% of the vessels and farms we source from  
Secure protections for workers across the supply chain by deploying worker voice and other empowerment mechanisms  
Continue to engage with social partners to ensure our requirements are up to date with current industry standards and practices.  
**Production**  
Ensure safety of all workers across Thai Union's processing sites by conducting regular training, hazard prevention and risk assessments  
**Supporting gender equity**  
Develop and enhance leadership development programs, ensuring equal gender participation  
Establish equal gender representation during interview processes for all management roles and internal succession planning of management roles

**FUTURE OUTCOMES**  
Impact Areas  
**Human & Labor Rights**  
100% of vessels & farms meet or are working towards meeting industry best practices in welfare & working conditions  
50% of management positions within our global operations are held by women  
United Nations Sustainable Developments Goals  
5 GENDER EQUALITY  
8 DECENT WORK AND ECONOMIC GROWTH  
10 REDUCED INEQUALITIES  
For more information & sources

The 2030 targets under the “Safe, Decent, and Equitable Work” commitment are as follows:

- 100% of the vessels and farms we source from are a safe and decent workplace;
- 50% of management positions within our operations are held by women;
- Reducing the lost time injury frequency rate to 0.15 <sup>1</sup>and strive towards zero accidents and injuries across our global operations.

While this sustainability work is designed to have a positive impact on the seafood industry, the milestones we achieve under SeaChange® 2030 will also deliver against 10 UN Sustainable Development Goals (SDGs). More specifically, achievements under the “Safe, Decent, and Equitable Work” commitment will contribute to SDG 5 (“Gender Equality”), SDG 8 (“Decent Work and Economic Growth”), and SDG 10 (“Reduced Inequalities”).

### 3.2) WORKING IN PARTNERSHIP AND COLLABORATION

To serve as a truly effective change leader, we align our sustainability efforts 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 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 several 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.
- [The Seafood Task Force](#) – Thai Union has been an active member of the [Seafood Task Force](#), a global trade association that includes some of the world’s largest retailers and seafood brands, who help tackle 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.
- [International Seafood Sustainability Foundation \(ISSF\)](#) – Thai Union is a founding participating company of the ISSF, whose objective is to improve the sustainability of tuna.
- [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 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) fishing 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. In 2022, Thai Union Group’s CEO Thiraphong Chansiri was appointed Chair of the Board of Directors of SeaBOS.
- [The Seafood Ethics Action Alliance \(SEA Alliance\)](#) – a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights.

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<sup>1</sup> Per 200,000 worked hours

- [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. In 2023, Thai Union participated in the [Bali Process Government and Business Forum and shared what measures Thai Union has implemented to protect workers across our supply chain](#).

We also collaborate 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.

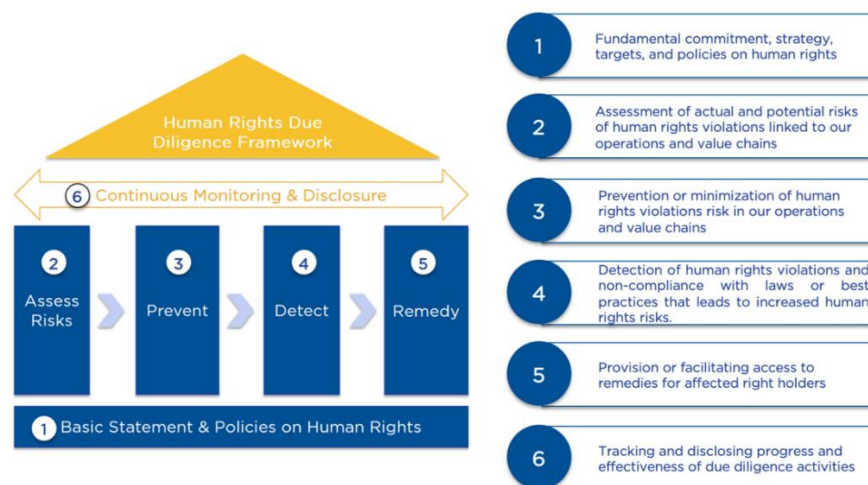
Our progress on sustainability has earned us various awards and recognitions by leading organizations around the world. The latest list of awards and recognitions can be found on [this SeaChange® webpage](#).

#### 4) HUMAN RIGHTS RISK ASSESSMENT

Some areas of the seafood industry are described as being labor intensive and having a complex supply chain involving many stakeholder groups. Similar to comparable industries are 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 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 organizations 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 supplier's location, the nature of the work, and whether there is any third-party involvement.

Previous risk assessment activities included:

- In 2015, a human rights risk assessment was conducted by independent experts to help identify and visualize potential human rights risks in **fisheries** that Thai Union sources from. Global consultation with internal and external stakeholders was conducted to discuss sustainability risks.
- In 2016, a human rights risk assessment was conducted for packaging, food ingredients, and the shrimp supply chain in Thailand.
- In 2018 and 2019, two separate desk-based research pieces were conducted 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 to help us get a more granular understanding of the risks and compare risks across the countries to prioritize our efforts.
- In 2020 and 2021, the desk-based research on human rights risk was repeated at a country level using a similar methodology to the previous exercise in 2018 and 2019 but with more updated data sources. In addition, the social audit results of fishing vessels were reviewed. The audits were conducted by independent consultants against the Thai Union [VCoC](#) and allowed for a more granular understanding of human rights risks related to fishing vessels. Furthermore, an independent human rights expert was commissioned to conduct a human rights risk assessment for the supply chain of Chicken of the Sea Frozen Foods (COSFF), under our U.S.-based subsidiary importer and distributor of frozen seafood. Finally, a special desk-based human rights risk assessment was conducted focusing on the potential impact on the rights of indigenous people from our operations and supply chain.

In 2022 we updated our human rights risk assessments, once again drawing on the most recent publicly available information sources as well as social audit findings. This has included the development of Fishery Level Assessments, which aims to consider not only the working conditions on board the vessels, but also the legal and regulatory landscape of the relevant authorities. The assessments provide an overview of what should be available and the level of enforceable actions. Based on the assessment, Thai Union makes practical decisions on how to proceed with the implementation of recommendations or improvement actions to cover an entire fishing ground as opposed to a specific fleet. This process includes involvement of association partners and increases capacity for awareness training. The assessments have been trialed in Alaska, Estonia, Portugal, and Latvia, with more countries scheduled for 2024.

We have identified the following six salient worker rights-related risks in our operations and value chains:

- Forced labor or modern slavery;
- Indebted or bonded labor arising from excessive recruitment fees;
- Lack of freedom of association or the lack of a worker voice;
- Child labor;
- Excessive overtime;
- Unsafe and unhealthy working conditions;

Further details on the risk assessment methodologies and assessment results are published [here](#).

Finally, in 2023 we partnered with IOM to conduct a human rights due diligence assessment of the recruitment experience of Myanmar migrant workers that Thai Union employed at two of our Thailand-based factories. Section 9 provides an extensive explanation on the assessment's rationale, outcome, and Thai Union's actions.

## 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 and subsequently updated in 2023, the policy states the commitment to use our commercial leverage and leadership role to address human rights issues 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. Separately, we recently issued a [Non Reprisal Policy](#) to protect any whistleblowers reporting actual or suspected violation of the Codes (see Section 5.4).

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 unacceptable. 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 will seek to collaborate with the suppliers to resolve non-compliances against the Code. 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 the business relationship with the supplier being suspended 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) Anti-discrimination & Anti-harassment Policy

Published in 2021, the policy states our commitment to prohibit all forms of discrimination, sexual harassment, non-sexual harassment in the Company's physical workplaces and in all work-related interactions and communications. The Policy also provides definitions of discrimination and harassment and establishes confidential and anonymous channels to report actual or suspected violations against the Policy to promote a culture of speaking up without any fear of retaliation, supported by our Non Reprisal Policy (see Section 5.4).

### 5.4) Non Reprisal Policy

Published in 2021, the Policy reinforces our commitment to conduct business with integrity, openness, and respect for universal human rights, specifically in line with our CoC Principle 10 "Workers have access to fair procedures". The Policy provides a definition of retaliation, establishes requirements to keep confidential whistle blowers' identities and to ensure confidential investigation, as well as establishes measures to protect employees from potential retaliation.

### 5.5) 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.

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

In January 2021, we updated the Ethical Migrant Recruitment Policy to reflect our commitment to cover an additional cost for the workers in the recruitment process. Finally, we issued the third update to the [Ethical Migrant Recruitment Policy](#), to reflect the "Employer Pays Principle" (EPP) for all recruitment of migrant workers for our Thailand-based operations, starting from January 1, 2022. Under the EPP, the Company will bear all recruitment-related fees and costs for all migrant workers, applicable to all new recruitment activities initiated by Thai Union after the implementation date. In 2023, a total of 199 new Memorandum of Understanding (MoU) workers were recruited under the Policy. More information on the MoU can be found on page 23, section 9. The MoU workers are those recruited via bilateral agreements between Thai government and the sending countries' governments aiming to promote safe and orderly migration.

Additionally, a total of 1,989 existing workers went through employment contract extension or documents renewal under the Policy.

In 2024, we will announce a Global Ethical Recruitment Policy, expanding our existing EPP approach in Thailand to cover all our operations globally.

## 5.6) 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 to achieve our gender equality target, which says that 50% of management positions within our organization are being held by women by 2030.

## 5.7) [Vessel Code of Conduct \(VCoC\)](#) & Vessel Improvement Program (VIP)

Thai Union set out a commitment to the safe and fair treatment of our workers in 2015 with the publication of our [Business Ethics and Labor Code of Conduct](#). On December 27, 2017, Thai Union published the Vessel Code of Conduct (VCoC) and Vessel Improvement Program (VIP), which is an extension of the Business Ethics and Labor Code of Conduct. The 12 'Fundamental Principles' apply to our business and frame both codes of conduct. However, in the VCoC, the clauses have been tailored for application to fishing vessels to reflect the fishing operations and conditions at sea. The intention of this is that its implementation will provide guidance to the fishing vessels that Thai Union sources from and improves the labor and working practices of the fishing sector.

Thai Union sources seafood from fishing vessels across the world that have different characteristics by way of different types of vessels, fishing gear, flag states, and crews. Seafood is processed in factories (on land) and sourced from a wide range of places including Europe, the U.S., Asia, and others. Thai Union's expectation is that all fishing vessels that the Company buys from are from suppliers that are continuously improving in their efforts to meet the clauses in the Thai Union VCoC and that this is monitored. Thai Union aims to work with suppliers and partners to continuously improve conditions on board vessels. Engaging and working with the fishing vessels (which Thai Union does not own or operate), the non-governmental organizations that promote the improvement of labor and working practices of the fishing sector, and the governments that are the coastal and flag states of the vessels will be key to driving change within the industry.

Following the launch of the VCoC, in 2018 Thai Union 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. The guidance document also aims to align auditors and independent consultants for the implementation of the program. Subsequently in 2020, Thai Union published an updated VCoC version 1.1 and corresponding updated Guidance document. The VCoC is available in Korean, Indonesian, Spanish, Thai, Traditional Chinese and Simplified Chinese to facilitate suppliers' understanding.

In 2022, Thai Union issued the second update of the VCoC version 2.0 and the corresponding Guidance Document. This update included the ethical recruitment extension which has been developed through further understanding of the recruitment journey of crews. Thai Union worked with consultants to extend the VCoC to be able to conduct recruitment mapping exercises of our suppliers similar to what had been done in the Thai factories. Audits against the VCoC are described in sections 7.1 and 7.2. Capacity building activities for suppliers to meet the VCoC are described in section 8.3.2.



In 2023 Thai Union issued the third update of the [VCoC version 3.0](#) with additional language versions such as French and German available. The most recent addition was as a result of the [benchmarking against industry benchmark leader the Consumer Good's Forum, Sustainable Supply Chain Initiative \(SSCI\) At-sea Operations Criteria \(social\)](#). These criteria set out benchmarking criteria for voluntary sustainability standards for fishing vessels. The Thai Union program cannot be officially benchmarked as it is not a certification scheme, however, an SSCI benchmark assessor was independently commissioned to conduct an unofficial benchmark. Version 3 of the VCoC includes any missing requirements of the SSCI at-sea operations criteria alongside up to date industry information.

Suppliers have received notification of the new version of the VCoC and are required to report on any new requirements. In addition to the code itself, an additional auditor handbook and program management has been developed to ensure auditors are provided with in-depth guidance and interpretation of each of the clauses. The management additions to the program ensure Thai Union has oversight and can effectively track progress towards commitments.

### 5.8) Vessel Documentation Requirements to Prevent Illegal, Unreported and Unregulated (IUU) Fishing

Thai Union works with the Royal Thai Government and other competent authorities to drive port-state measures to eliminate seafood originating from Illegal, Unreported and Unregulated (IUU) fishing from our supply chains. In Thailand, a robust vessel-to-processor traceability system has been implemented 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 crew member 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.

### 5.9) 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 fairly investigating 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.

## 6) Monitoring & Oversight Measures Addressing Modern Slavery and Unethical Labor Practices Within Our Own Operations

### 6.1) Audits of Thai Union's Own Facilities

Thai Union's 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, as well as several 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 Thai Union subsidiaries in Thailand 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.

## 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, is always available online and through toll-free numbers reachable from 15 countries, 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 avenue 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](mailto: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 our factories have established a welfare committee. Since 2016, we have worked with an NGO partner 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](#).
- **NGO partners' physical outreach, independent helplines, smartphone app, and social media platform** – In addition to internal grievance and worker voice mechanisms, workers at our facilities are provided with access to NGO partners' hotlines, provided free of charge and available in workers' native languages to accommodate migrant workers. Employees can report issues of concern or submit requests for help



independently of Thai Union management. The details of the helpline are provided on posters at our factories. We have actively addressed key issues uncovered through this grievance channel. We will continue to partner with NGO partners 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 [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.

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. The baseline assessment of the worker voice mechanism was conducted to identify key gaps.

As a result of the "Tell Us" project, in 2020 we issued a global [Non Reprisal Policy](#) as explained in Section 5.4. In addition, we issued [guidelines to classify and rate the severity of workers' complaints](#) to ensure that raised issues are addressed in a timely and sensitive manner. Finally, to ensure that workers are provided with remedies in the events where we have caused or contributed to an adverse impact to workers' rights, we published a [guideline for determining appropriate remedial actions](#).

Finally in 2022, we conducted two pilot training sessions covering 165 Thai Union staff from the factory management teams, Human Resources teams, Employee Relations teams, Workers' Line Supervisors and Managers team, and Worker Welfare Committee (WWC) members. The training's objectives are:

- To strengthen the WWC through developing a more comprehensive understanding of grievance and WWC roles and responsibilities among its management and worker members;
- To provide Thai Union management and worker representatives with knowledge and practical skills that will enable them to fulfill their roles more effectively;
- To support Thai Union's capacity in implementing its grievance mechanism by providing a common, in-depth understanding of key concepts, policy, and procedures among its relevant actors.

## 7) Monitoring & Oversight Measures Addressing Modern Slavery and Unethical Labor Practices Within Our Supply Chain

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 and services due to different levels of human rights risks associated with different supply chains.

Thai Union calls for compliance with our CoC or VCoC from all suppliers. New suppliers must acknowledge and accept the Codes before they begin 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 products from Illegal, Unreported and Unregulated (IUU) fishing enter our processing facilities and prevent labor rights abuses. All suppliers must pass Thai Union's pre-appraisal to

ensure compliance with applicable laws and 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 there is no IUU and confirm 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 Logbook (where applicable).

In 2017 and 2018, 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.

From 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](#).

In 2020 and 2021, due to COVID-19-related travel and visit restrictions, we had to develop and implement new ways of working. In 2023, we completed additional third-party social audits on two Thai-flagged vessels.

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

Similar to the seafood raw materials sourced from Thailand, Thai Union has policies and procedures in place to ensure traceability, that no fish enters the supply chains that are from vessels where illegal activity such as IUU fishing or human rights abuses happen. Before supplying to Thai Union, suppliers need to ensure that fishing vessels supplying tuna (whole or processed loins) are identified and in full compliance with IUU, ISSF, and DG Mare resolutions. The documentation is mandatory for ensuring the traceability of fish and bringing the evidence that no IUU fish is entering into the supply chain, EU catch certificates being mandatory and giving full details of the boat itself and the capture.

In 2016 and 2017, Thai Union commissioned third-party audits be conducted of the fleet supplying tuna to European markets. The audits covered several different aspects of requirements that we have with our suppliers such as; compliance with regulations by the EU and the ISSF, fishing licenses, quality and food safety, the Thai Union sustainability policy and the Business Ethics and Labor CoC.



In 2018, Thai Union began a new third-party audit program of vessels against the VCoC, with a focus on the tuna vessels involved in Fishery Improvement Projects (FIPs). Since August 2018, audits have been conducted on tuna 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. The progress on audit and improvement actions were published in our [2023 Sustainability Report](#). Since 2018, the global audits have expanded to include all tuna suppliers regardless of Fishery Improvement Project involvement. This increased uptake in audits and vessel improvement programs is as a direct result of the Thai Union Tuna Commitment up to 2025.

To further develop the program, in 2022 Thai Union contracted MRAG Ltd. consultants to conduct the first social audits at sea. This [blog](#) outlines the project. The at-sea audits focused on health and safety and general working conditions on board the vessels. The auditor was placed on board a carrier vessel and audited 19 vessels during transshipments.

In 2023 and at the beginning of 2024, audits have continued towards ensuring all tuna suppliers are part of a vessel improvement program and are actively reporting on actions against any areas for improvement identified during the audits. In 2024, this program has begun processes for expanding into other species and locations, as per SeaChange® 2030.

Between January and December 2023, 20 onsite audits on global tuna vessels were conducted and one remote audit. A further five audits were conducted in the Pacific in early 2024, and additional vessels were boarded for spot checks in Ghana and Mauritius. During these audits, 155 crew were interviewed including seven different nationalities.

### 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.

For 2023, out of the total number of suppliers in the audit program, 11 percent were classified as "high risk" and 89 percent as "medium risk". As a result, these high or medium risk suppliers either received third-party audits against our CoC or submitted qualified social standard certifications.

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

While Thai Union owns or 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 fish 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 2022, we conducted additional second-party audits of 12 vessels in our fishmeal supply chain.

In 2022, we completed second-party social assessment of 25 Thai shrimp farms in our supply chain. We are also implementing a program to strengthen human rights due diligence of our entire shrimp supply chain, consisting of supply chain mapping, auditing, engagement, and capacity building, in collaboration with the Seafood Task Force.

In 2023, we participated in Seafood Task Force's shrimp supply chain third-party audit program covering Thai shrimp farms and Thai-flagged vessels supplying fishmeal for our shrimp feed. We also participated in Seafood Task Force's Training Programs aiming to raise social compliance standards for farms and vessels.

## 8) TRAINING AND CAPACITY BUILDING ON MODERN SLAVERY, HUMAN TRAFFICKING, AND HUMAN RIGHTS

Addressing modern slavery and human trafficking is an issue that we must take responsibility for and at the same time work collaboratively to tackle the challenges at scale. 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) 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 child labor and human trafficking. The Ethical Migrant Recruitment Policy was subsequently updated in 2022 to reflect the Employer Pays Principle.

Under the policy, candidates who are offered positions will receive training by Thai Union and NGO partners on terms and 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. In 2023, only one pre-departure training session was conducted because there was only one round of recruitment of migrant workers via the cross-border MoU process.

## 8.3) 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:

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

Since 2016, we have been organizing training on our Business Ethics and Labor Code of Conduct (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 2023, we provided in-person training for 5 new suppliers. Furthermore, currently all 622 suppliers under our Responsible Sourcing program have access to the online Social Performance Platform, where they can learn about our CoC at their own pace.

### 8.3.2) Fishing vessels

In 2017, an update on expectations for labor compliance and auditing to all international tuna suppliers was provided through two workshops, held in Bangkok and Paris. In 2018 and 2019, the [Vessel Improvement Program \(VIP\)](#) began to raise suppliers' capacity to meet our VCoC. We rolled out [new Capacity Building for Fisher Safety at Sea program](#) for vessel operators in our supply chain, in collaboration with the International Labour Organization (ILO) and International Transport Workers' Federation (ITF). To date, workshops have been held in the provinces of Pattani, Ranong, Rayong, and Chumphon, with about 300 fishers from vessels that Thai Union sources from. The 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. In 2020 and 2021, the health and safety training was put on hold due to COVID-19-related travel and visit restrictions however, the content was reviewed with our partners and the program was extended to include more aspects of working at sea such as fishers' rights. In 2022, the training was resumed. A total of 9 training sessions were conducted for more than 690 fishers across almost 60 vessels.

Furthermore, in 2020 work was developed to establish a project to increase vessel crews' understanding of their employment contract in partnership with Creative Contracts. They specialize in 'comic contracts' which uses pictures and graphics in the contracts to make the information more accessible. In 2022, we completed pilots testing draft comic contracts with selected suppliers in Thailand.

Since 2018, each year aggregated audit and vessel improvement results are analyzed to set priorities for the next year. In 2021 and 2022, the priority vessel audits and improvement plan engagement focused on participants and suppliers within the fisheries involved in projects to achieve MSC (FIPs). By the end of 2022, all suppliers within the FIPs had either completed their VIP to meet the Thai Union VCoC or had created their improvement plans and/or they had begun the process of considering establishing their VIP. As previously mentioned, the VCoC covers aspects related to preventing and eliminating modern slavery and human trafficking, and improving workers understanding of their human rights and making sure that suppliers are doing the right actions to ensure the same. In 2023, this was expanded to all tuna suppliers, and regular meetings/contact is made with suppliers to ensure regular reporting of the improvement actions within their vessel improvement program. All suppliers are required to not only develop corrective actions, but also submit a root cause analysis which enables our external consultants to ensure the action is appropriate and effective in addressing the area for improvement.

To encourage improvement actions, each supplier developed their improvement action plans to be implemented across their entire fleets and verification checks were conducted on a sample basis for compliance purposes. External consultants are contracted to review and assess the evidence against the root cause analysis which confirmed that the actions taken by the vessel owners were sufficient in closing the finding.

Thai Union held regular bilateral meetings with suppliers and vessel owners for increased engagement and discussion about any issues and barriers for the implementation of improvements. These meetings included training on each of the core principles of the Thai Union VCoC and how to complete an effective VIP. In 2023, this process was formalized, and members of the procurement teams are looped in to ensure supplier engagement. This has included building internal capacity within procurement teams to ensure all members are aware of the importance of compliance with the VCoC.

Further program development has taken place in Ghana where an in-country consultant worked directly with the vessel owners to implement their corrective actions. The in-country consultant collected first-hand evidence to report back to Thai Union and the external consultants. Similarly, in Mauritius, further engagement from the vessel owner has enabled wider improvement projects to be developed such as clock-in and clock-out systems for the crew members to better understand working times. Other suppliers implemented crew and captain handbooks with all relevant information regarding working conditions and their responsibilities. In addition, regular working group sessions have been set up with certain suppliers who may have multiple fleets to ensure all teams are aligned and improvements are implemented fleet- or companywide.

In 2024, the priority will be to continue VIPs that are not yet completed and continue to expand the work involving recruitment agencies of suppliers. Audits will continue on board any tuna supplier not yet engaged and Thai Union will look forward to formalizing systems and processes of verification as the suppliers work towards compliance.

### 8.3.3) 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.

Since 2018, we have an ongoing project to sponsor and raise capacity of selected shrimp farms to achieve ASC or BAP certifications which address environmental and social responsibility, animal welfare, food safety, and traceability. In 2022, a total of 83 shrimp farms either owned or sponsored by Thai Union received BAP certification. A total of 8 farms either owned or sponsored by Thai Union received ASC certifications.

In 2023, we continued to sponsor selected Thai shrimp farms to support them to achieve certifications. We also partnered with ASC to announce a [collaboration on Aquaculture Improvement Project \(AIP\)](#) for shrimp.

#### 8.3.4) Labor recruitment agencies

Across 2018 to 2022, we continued to focus on strengthening the implementation of our Ethical Migrant Recruitment Policy together with our NGO partners and recruitment agents in our supply chain. 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).

Finally, at the invitation of the Seafood Task Force, the recruitment agencies in our supply chain participated 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 initial assessment of the agents' practices against the OTL standards were completed in 2020. In 2022, two recruitment agencies in our supply chain completed third-party audits against the OTL standards. In addition, a third-party survey was conducted on a sample of workers to validate agencies' ethical performance. Finally, in 2023 both agencies received the OTL certifications.

Regarding labor recruitment in fishery operations in our supply chain, the VCoC includes a recruitment mapping exercise which requires all suppliers to submit information on the recruitment agencies used both in sending and receiving countries. As part of the exercise, external consultants will assess the level of due diligence in place for each supplier, and where possible this includes interviews with the recruitment agencies. The priority is to ensure that the suppliers are operating with legally registered recruitment agencies and ensuring due diligence is enforced and checked regularly against the requirements set out in the VCoC.

## 9) OTHER ACTIVITIES RELATED TO HUMAN RIGHTS

### 9.1) Compensating Myanmar Migrant Workers for human rights impact associated with in-country recruitment

#### Context

During 2020-2022, the COVID-19 pandemic and border closures halted regular migration between Myanmar and Thailand under the MoU channel between the two countries, pushing many Myanmar nationals to irregularly leave their home country due to political instability and limited job prospects in Myanmar. In Thailand, migrant workers with soon-to-expire documents faced uncertainty during the pandemic, prompting the Royal Thai Government to issue several Cabinet Resolutions allowing for in-country work and stay permit extensions or issuances of working time windows. Serving as legal amnesties, these Cabinet Resolutions allowed employers to legally recruit migrant workers in Thailand who held either expired documentation or no documentation at all given that they would register to obtain documentation through the above Cabinet Resolutions. However, this registration system lacked sufficient monitoring and guidance on the in-country recruitment process, as well as verification to determine whether registered migrant workers had already resided in Thailand or had just arrived unregistered from neighboring countries. Many Thai employers – including Thai Union – recruited migrant workers under such Cabinet Resolutions due to labor shortages and the inability to recruit workers via regular MoU channels.

## Thai Union's actions & results

Thai Union is committed to providing a safe, decent, and equitable workplace and ensuring responsible recruitment across our global operations. Recognizing the potential human rights risk associated with recruitment under the legal amnesty programs, Thai Union partnered with [IOM](#) in May 2023 to conduct a human rights due diligence assessment of the recruitment experience of Myanmar migrant workers that Thai Union employed at two of our Thailand-based factories. In scope were only migrant workers recruited as so-called walk-ins under the Royal Thai Government's Cabinet Resolutions which allowed the hiring of undocumented workers, or those whose documentation had expired during the COVID-19 pandemic which caused the regular migration pathway, the MOU channel, to be suspended for an unspecified period of time. The aim of the assessment was to gather insights on migrant workers' recruitment experiences, particularly focusing on recruitment fees and related costs paid, to provide Thai Union with practical recommendations for potential remediation.

The assessment found that Myanmar migrant workers recruited at the two sites under the legal amnesty program encountered significant challenges during their irregular journey to Thailand. It should be noted that the types of challenges and potential adverse human rights impacts found in the IOM assessment are not unique to Thai Union nor the seafood industry but across multiple industries. A recently published [study](#) focusing on in-country recruitment of migrant workers in Thailand during the pandemic, conducted by Dignity in Work for All (DIWA), also uncovered significant recruitment fee and related costs borne by workers across Thailand in various industry sectors.

Based on the recommendations of the IOM assessment, Thai Union proceeded to repay over 5,000 Myanmar migrant workers THB 15,000 (around £320) per person for compensation for the adverse human rights impacts experienced during the migration journey which the Company had indirectly contributed to, by January 2024. This was in line with IOM recommendations and the third Pillar ("Remedy") of the UN Guiding Principles on Business and Human Rights (UNGPs). In addition, Thai Union collaborated with IOM to conduct an independent review of the repayment process to understand its effectiveness through worker surveys, worker focus group discussions, and management interviews. In this review, 91 percent of respondents expressed satisfaction with the repayment and its process.

Thanks to this assessment, Thai Union has become much more aware of the human rights related risks associated with hiring through the 'walk-in' recruitment process under the Cabinet Resolutions. Based on the assessment, Thai Union aims to recruit Myanmar migrant workers as extensively as possible via the MOU channel. Where that is not practicable, Thai Union will follow the 'walk-in' recruitment process with more stringent due diligence. This includes a robust process to screen and verify job seeker' documentations and interview them to ensure that they had recently legally worked and lived in Thailand.

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 fluid, overlapping strokes.

Cheng Niruttinanon  
Executive Chairman  
Thai Union Group PCL

A blue ink signature of Thiraphong Chansiri, featuring a large, stylized initial 'T' followed by the name.

Thiraphong Chansiri  
President & CEO  
Thai Union Group PCL

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