



Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2018/19)

*The term 'modern slavery' used in this survey is taken to include forced labour, slavery, human trafficking, servitude, bonded and child labour.

Company: Thai Union Group PCL

Human Rights Policy

1. Has your company made a public commitment to respect **human rights**? If so, please provide a link.

Thai Union stated the commitment to uphold human and labor rights in our operations and supply chain in the [Human Rights Policy, Business Ethics and Labor Code of Conduct \(CoC\), and Vessel Code of Conduct \(VCoC\)](#). Issued in 2015, the CoC conveys our expectations and standards related to business ethics and labor practices, applicable to all Thai Union employees, suppliers, and any sub-suppliers employed by primary suppliers in business with our company. The CoC is available in 19 languages to facilitate communication across our workforce and supply chain.

Globally, Thai Union owns no vessels but uses our market position to improve labor conditions throughout the seafood supply chain. In December 2017 Thai Union published its [Fishing Vessel Improvement Program and Vessel Code of Conduct \(VCoC\)](#), which focuses on the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. The VCoC is an extension of the company's CoC that was previously introduced in 2015 but reflects a unique set of working conditions on fishing vessels. Thai Union's existing and new vessel suppliers, including those supplying tuna from the Pacific region, are required to sign the VCoC in order to work with the company.

Launched in 2018, the Human Rights Policy states the commitment to use our commercial leverage and leadership role to address human rights issues not only in our value chain but also in the wider global seafood industry. In line with the previously issued CoC, 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.

2. If yes, does the company's commitment address **modern slavery*** and does it apply throughout your supply chains? Please provide details.

Our commitment to respect human rights also addresses modern slavery throughout our supply chain. Among other requirements, the CoC states "Forced labor, whether in the form of indentured labor, bonded labor or other forms, is not acceptable. Mental and physical coercion, slavery, and human trafficking are prohibited". Employment of children under the age of 15 or under the minimum age for work as specified by labor law in the country is also prohibited.

The CoC not only prohibits modern slavery but also addresses other forms of unethical and unacceptable labor practices such as unfair wages, discrimination, and excessive working hours. Specific requirements can be found in the [CoC](#).

3. Does the company have a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Please provide details.

As stated in the response to Question 1, Thai Union's [CoC](#) applies to our employees, suppliers, and any sub-suppliers employed by primary suppliers in business with our company. Thai Union's VCoC is applicable for fishing vessels in our supply chain. All contracted and prospective suppliers to Thai Union must sign an acknowledgment of the CoC, whereby they accept to strictly follow our mandatory principles and policies on business ethics and labor practices.

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part?

We mapped our tuna supply chains globally, including those sourced from the Pacific region. Thai Union published sourcing locations for all key seafood species, including Tuna, in Thai Union's [2017 Sustainability Report](#), page 18. In addition, we will soon publish a supply chain transparency report for our tuna supply chain for our European brands within the first quarter of 2019 at this [link](#).

5. Does the company source tuna from the **Pacific** region?

Yes, we source from the Pacific region. Thai Union published sourcing locations for all key seafood species, including Tuna, in Thai Union's [2017 Sustainability Report](#), page 18. In addition, we will soon publish a supply chain transparency report for our tuna supply chain for our European brands within the first quarter of 2019 at this [link](#).

6. Does your company have a **human rights due diligence** policy, process or procedure to identify, assess and manage human rights risks (actual or potential), including modern slavery, in its operations (and those of its subsidiaries) and supply chains?

Thai Union's effort to fight modern slavery is guided by our [Human Rights Due Diligence Framework](#), which was recently updated in 2018. The framework is a holistic, six-pillar approach to address the issues of human rights including modern slavery, in line with the United Nations Guiding Principles on Business and Human Rights.

If so, please provide details and describe the human rights due diligence process. **Key steps include:** (i) *identifying* and assessing human rights impacts; (ii) *integrating* and *acting on* findings; (iii) *tracking* the effectiveness of the company's response; and (iv) *communicating externally* about how the company is addressing its human rights impacts.

Under the framework, we have implemented various policies, activities, and initiatives to address modern slavery in our operations and supply chain globally and for all seafood

species. Below, we highlight some examples that are relevant -but not exclusively limited to - sourcing and processing of Pacific tuna:

1. Pillar 1 – Basic Statement & Policies on Human Rights - *setting a specific strategy and measurable targets on human rights as well as policies to achieve them*

We commit to providing safe, legal and freely-chosen employment in our own facilities and supply chains, as publicly stated under "Safe and Legal Labor" Pillar of our Sustainability Strategy [SeaChange®](#). Our goal is to eradicate forced labor, modern slavery, child labor, as well as other forms of unethical labor practices in our operations and supply chains. We also commit to drive meaningful improvements across the entire global seafood industry and not only specific to Thai Union's value chain.

More specifically, we set five milestone targets to be achieved by 2020, related to fair and legal employment, workers empowerment, traceability, compliance with Thai Union's Codes of Conduct, and stakeholder engagements. In particular, these milestones will also contribute to the UN Sustainable Development Goal (SDG) Target 8.7 on eradication of forced labor, modern slavery, human trafficking, and the worst form of child labor.

Three key human rights related policies are:

1.1 [Human Rights Policy](#) - Launched in 2018, the Policy states the commitment to use our commercial leverage and leadership role to address human rights issues not in our value chain but also in 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.

1.2 [Business Ethics and Labor Code of Conduct \(CoC\)](#) - Issued in 2015, the CoC conveys our expectation and standards related to business ethics and labor practices, applicable to all Thai Union employees, suppliers, and any sub-suppliers employed by primary suppliers in business with our company. Among other requirements, the CoC states "Forced labor, whether in the form of indentured labor, bonded labor or other forms, is not acceptable. Mental and physical coercion, slavery, and human trafficking are prohibited". Employment

of child under the age of 15 or under the minimum age for work as specified by labor law in the country is also prohibited. The CoC not only prohibits modern slavery but also addresses other forms of unethical and unacceptable labor practices such as unfair wages, discrimination, and excessive working hours. More specific guidance can be found in the [CoC](#).

1.3 [Vessel Code of Conduct \(VCoC\)](#) - To further improve standard for labor rights in the fishing sector, in December 2017 Thai Union published its [Fishing Vessel Improvement Program and Vessel Code of Conduct \(VCoC\)](#), which focus on the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. The VCoC is an extension of the company's CoC that was previously introduced in 2015 but reflects a unique set of working conditions on fishing vessels. Thai Union's existing and new vessel suppliers, including those supplying tuna from the Pacific region, are required to sign the VCoC in order to work with the company.

2. Pillar 2 – Assess Risk – *assessing actual and potential risks of human rights violations caused by or linked to Thai Union's operations and value chains.*

In 2015, we conducted human rights risk assessment for fisheries supply chain and separately a global consultation with stakeholders to discuss sustainability risks including human rights risks. In 2016, we conducted human right risk assessment for packaging, food ingredient, and shrimp supply chain in Thailand. In addition, we conducted social-dialogue based audits of our labor supply chain in Thai Union's factories, in partnership with an NGO Migrant Worker Rights Network (MWRN). Most recently, in 2018, we conducted desk-based human rights risk assessment at a country level for countries where we operate and source from, focusing on the issues of labor trafficking, forced labor, and child labor. This assessment draws on publicly available data sources, namely, US Trafficking in Persons (TIPs) Report 2017, the 2016 Global Slavery Index by the Walk Free Foundation and International Labour Organization (ILO), and the US Department of Labor's reports on Child Labor and Force Labor. The purpose is to help us get more granular understanding of the risks and compare risk across the countries in order to

prioritize our mitigation efforts. Further details of the Human Rights Risk Assessment can be found [here](#).

As a next step, we will continue to conduct a more granular level of risk assessment for specific production site or specific raw material supply chain utilizing publicly available data and internal data such as audit results and workers complaint logs. These include audit results from the ongoing audit program of fishing vessels against the Vessel Code of Conduct (VCoC).

3. Pillar 3 – Prevent – *implementing policies and measures to prevent or minimize the risks of human rights violations in our operations and value chains*

3.1 Employees training on labor and employment rights -we are working with the Migrant Worker Rights Network (MWRN) and Labor Rights Promotion Network (LPN) on initiatives such as training migrant workers to be aware of human and employment rights, as well as their children's rights to education. Furthermore, we provide a training on the CoC for new employee orientation as well as regularly conduct refresher CoC training for existing employees. We also collaborate with MWRN to conduct pre-departure training on labor rights and Thai labor law for migrant Burmese workers employed in our Thailand-based factories.

3.2 [Ethical Migrant Recruitment Policy](#) - We worked together with MWRN to develop 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 workers' rights and terms of employment contracts, in order to reduce the risk of debt bondage and forced labor. Subsequently in 2017, this Policy expands to cover all Thai Union's facilities globally. Finally, an ethical trade consultancy firm Impactt has conducted an independent evaluation of the Policy. Findings will be published around January 2019 and will be used as evidence base to inform areas for internal improvement as well as draw lessons learned for other employers interested in ethical recruitment.

3.3 Supplier Training & Resources on the Thai Union's Codes

All contracted and prospective suppliers to Thai Union must sign an acknowledgment of the [Business Ethics and Labor Code of Conduct \(CoC\)](#), whereby they accept to strictly follow our mandatory principles and policies on business ethics and labor practices. Following the launch of the Code, we created a supplier capacity building program to ensure that suppliers understand and can comply with the Code. The supplier training program is explained in details on pages 12-13 of the [2017 UK Modern Slavery Act Transparency Statement](#).

Following the launch of the Vessel Code of Conduct (VCoC) in 2017, we published the [Guidance to 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. Furthermore, we are developing a set of Vessel Improvement Program (VIP) toolkits to provide practical resources for vessel owners such as a checklist for health & safety assessment on board vessels, guidance for developing grievance mechanism, and guidance for creating employment contract.

In August 2018, Thai Union partnered with the International Labor Organization and International Transport Workers' Federation to run a health and safety training workshop for its suppliers in Thailand's Pattani Province. The workshop was part of the company's Capacity Building for Fisher Safety at Sea program, and brought together approximately 60 vessel owners, captains, crew supervisors, crew members and other staff. Key findings from our first third-party audit and surveys from Thai fishers were used to devise the training workshop's agenda, which ensured workers' voices were taken into consideration and the material was directly relevant and useful for them. Similar training sessions were recently organized in the provinces of Ranong and Rayong.

3.4 Transshipment Policy

Transshipment is linked with high risk of labor abuse including forced labor. To minimize the risk, in 2015 Thai Union introduced a policy that bans transshipment at sea in Thai and international waters in line with the Royal Thai Government Resolution and the International Seafood Sustainability Foundation Resolution. In addition, to help meet our 2020 commitments in the [Greenpeace agreement](#), we are working with partners on electronic and human observer programs for longline vessels. Our commitment and

related progress on transshipment can be viewed in the [progress report on the Greenpeace Agreement](#).

4. Pillar 4 – Detect – *implementing policies and measures to identify actual and potential human rights in both our operations and value chains, including through social audits and worker voice mechanism*

4.1 Third-party and internal audit of our own operations - our processing factories regularly receive third-party audits against globally recognized social standards, including requirements related to modern slavery, such as ETI Base Code, Amfori BSCI Code of Conduct, Sedex, or customers' codes. Currently, all of our tuna-processing factories based in countries deemed as high-risk have received Amfori BSCI and/or SMETA audits. In addition, we annually conduct internal audits of all of our Thailand-based factories against the CoC and related Thai labor law.

4.2 Third-party audit of fishing vessels against the Vessel Code of Conduct (VCoC) - Globally, Thai Union owns no vessels but uses our market position to improve labor conditions throughout the seafood supply chain. An audit program of vessels in our supply chain against the VCoC, released in December 2017, has begun in 2018. This program covers our global tuna supply chain, including those sourced from the Pacific, and Thai-flagged vessels. Thai Union commissions a rolling program of independent third-party auditing in its supply chains. Audits will be completed in accordance with industry best practice standards. Audits of tuna vessels will be completed for the Pacific, Atlantic, and the Indian Oceans.

4.3 Providing Workers with Voice - Thai Union provides and promotes various internal and external grievance channels for our employees, suppliers' employees, or any whistle blowers who wish to report complaints and violations against our CoC. These are internal hotlines, welfare committees, suggestion boxes, and confidential email address (labor.coc [at] thaiunion.com), for example. Various grievance channels, as well as other platforms for worker voice, are described on the pages 15-16 of our [2017 UK Modern Slavery Act Statement](#). We are also in a process of launching a new global grievance mechanism accessible to all our employees. We support a culture of speaking up without fear of

retaliation against those who report actual or suspected breaches, as indicated in our [Human Rights Policy](#) and the [CoC](#).

5. Pillar 5 – Remedy – *providing remedies or facilitating access to effective remedies to affected rights holders.*

To verify our own operations' compliance, we annually conduct internal audits of all of our Thailand- based factories against the CoC and related Thai labor law. Relevant management teams will implement time-bound corrective action plans for identified non-compliances, which will then be verified by our central internal audit team.

Similarly, we arrange various audit schemes of our suppliers to identify potential non-compliances against our Codes and related laws and regulations, as explained under Pillar 4. As stated in our [Business Ethics and Labor Code of Conduct \(CoC\)](#), we will seek to work with our suppliers to resolve non-compliances as the first response to non-compliance. 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 suspension until proof of rectification is available.

As explained in the previous section, an audit program of vessels in our supply chain against the VCoC along with the Vessel Improvement Program (VIP) has begun in 2018. Each audit against will result in an audit report that will assess compliance of the vessel(s) with the VCoC and provide an evaluation if an improvement is needed.

6. Pillar 6 - Continuous Monitoring & Disclosure – *Measuring and disclosing progress of our human rights due diligence activities and their impact to ensure that we achieve intended outcome*

Transparency is one of the key Operating Principles in implementing our Human Rights Due Diligence Framework. All activities on our efforts to uphold human rights, including eradication of modern slavery, are regularly reported in Thai Union's Annual Report, Annual Sustainability Report, UK Modern Slavery Act Transparency Statement, Safe &

Legal Labor Update Report, and SeaChange® Website. We published a progress report on the Greenpeace agreement to drive positive changes in the seafood industry by tackling environmental and labor rights issues in our fishery supply chain.

In June 2018, we released an [aggregate result of our first industry collaborative third-party audit](#) on some Thai commercial fishing vessels in our supply chain. Aggregate results of the ongoing VCoC audits will be published in the 2018 Annual Sustainability Report. Our transparency in releasing these results is focused on helping to drive change throughout the industry.

As previously mentioned, an ethical trade consultancy firm Impactt has conducted an independent evaluation of our [Ethical Migrant Recruitment Policy](#). Findings will be published around January 2019 and will be used as evidence to inform areas for internal improvement as well as draw lessons learned for other employers interested in ethical recruitment.

Finally, we are currently updating a public statement in compliance with the requirements under the California Transparency in Supply Chains Act 2010, for our US subsidiary Tri-Union Seafoods, LLC., which manufactures and distributes canned seafood under 'Chicken of the Sea' brand.

7. Has the company taken **practical action** to ensure that modern slavery does not occur in the company's (or its subsidiaries') operations and supply chains for tuna procurement from the Pacific? If so, please describe.

Thai Union's effort to fight modern slavery is guided by our [Human Rights Due Diligence Framework](#), which is a comprehensive six-pillar approach to address the issues of human rights. As explained in response to the previous question, we have taken practical actions to prevent or minimize the risks of human rights violations in our operations and value chains under the Pillar 3 "Prevent" of our Framework. Below, we recap some key preventative measures:

- **Employees training on labor and employment rights** -we are working with the Migrant Worker Rights Network (MWRN) and Labor Rights Promotion Network (LPN) on

initiatives such as training migrant workers to be aware of human and employment rights, as well as their children's rights to education. Furthermore, we provide a training on the CoC for new employee orientation as well as regularly conduct refresher CoC training for existing employees. We also collaborate with MWRN to conduct pre-departure training on labor rights and Thai labor law for migrant Burmese workers employed in our Thailand-based factories.

- **[Ethical Migrant Recruitment Policy](#)** - We worked together with MWRN to develop 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 workers' rights and terms of employment contracts, in order to reduce the risk of debt bondage and forced labor. To provide oversight, MWRN helps to interview our job candidates to identify excessive fee and cost charged to workers and to identify other irregularities in the upstream recruitment process.

Subsequently in 2017, this Policy expanded to cover all Thai Union's facilities globally. Finally, an ethical trade consultancy firm Impactt has conducted an independent evaluation of the Policy. Findings will be published around January 2019 and will be used as evidence base to inform areas for internal improvement as well as draw lessons learned for other employers interested in ethical recruitment.

- Supplier Training & Resources on the Thai Union's Codes

All contracted and prospective suppliers to Thai Union must sign an acknowledgment of the [Business Ethics and Labor Code of Conduct \(CoC\)](#), whereby they accept to strictly follow our mandatory principles and policies on business ethics and labor practices. Following the launch of the Code, we created a supplier capacity building program to ensure that suppliers understand and can comply with Code. The supplier training program is explained in details on pages 12-13 of the [2017 UK Modern Slavery Act Transparency Statement](#).

Following the launch of the Vessel Code of Conduct (VCoC) in 2017, we published the [Guidance to 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. Furthermore, we are developing a set of Vessel Improvement Program (VIP) toolkits to provide practical resources for vessel owners such as a checklist for health & safety assessment on board vessels, guidance for developing grievance mechanism, and guidance for creating employment contract.

In August 2018, Thai Union partnered with the International Labor Organization and International Transport Workers' Federation to run a health and safety training workshop for its suppliers in Thailand's Pattani Province. The workshop was part of the company's Capacity Building for Fisher Safety at Sea program, and brought together approximately 60 vessel owners, captains, crew supervisors, crew members and other staff. Key findings from our first third-party audit and surveys from Thai fishers were used to devise the training workshop's agenda, which ensured workers' voices were taken into consideration and the material was directly relevant and useful for them. Similar training sessions were recently organized in the provinces of Ranong and Rayong.

- Transshipment Policy

Transshipment is linked with high risk of labor abuse including forced labor. To minimize the risk, in 2015 Thai Union introduced a policy that bans transshipment at sea in Thai and international waters in line with the Royal Thai Government Resolution and the International Seafood Sustainability Foundation Resolution. In addition, to help meet our 2020 commitments in the [Greenpeace agreement](#), we are working with partners on electronic and human observer programs for longline vessels. Our commitment and related progress on transshipment can be viewed in the [progress report on the Greenpeace Agreement](#).

8. [If the company has taken steps to identify and address human rights risks, how does it \(a\) prioritise which risks to address first; and \(b\) assess and track the effectiveness of its actions and response?](#)

Per our [Human Rights Due Diligence Framework](#), we have assessed actual and potential risks of human rights violations that are caused by or linked to our operations, in order to inform subsequent risk mitigation activities (under Pillar 1 of the Framework). In 2015, we conducted human rights risk assessment for fisheries supply chain and separately a global

consultation with stakeholders to discuss sustainability risks including human rights risks. In 2016, we conducted human right risk assessment for packaging, food ingredient, and shrimp supply chain in Thailand. In addition, we conducted social- dialogue based audits of our labor supply chain in Thai Union's factories, in partnership with an NGO Migrant Worker Rights Network (MWRN). Most recently, in 2018, we conducted desk-based human rights risk assessment at a country level for countries where we operate and source from, focusing on the issues of labor trafficking, forced labor, and child labor. This assessment draws on publicly available data sources, namely, US Trafficking in Persons (TIPs) Report 2017, the 2016 Global Slavery Index by the Walk Free Foundation and International Labour Organization (ILO), and the US Department of Labor's reports on Child Labor and Force Labor. The purpose is to help us get more granular understanding of the risks and compare risk across the countries in order to prioritize our mitigation efforts. Further details of the Human Rights Risk Assessment can be found [here](#).

As a next step, we will continue to conduct a more granular level of risk assessment for specific production site or specific raw material supply chain utilizing publicly available data and internal data such as audit results and workers complaint logs. These include audit results from the ongoing audit program of fishing vessels against the Vessel Code of Conduct (VCoC).

As previously stated, we set [five milestone targets](#) to be achieved by 2020, related to fair and legal employment, workers empowerment, traceability, compliance with Thai Union's Codes of Conduct, and stakeholder engagements. We regularly monitor and publish progress towards meeting our targets via [Thai Union's Annual Report](#), [Annual Sustainability Report](#), [UK Modern Slavery Act Transparency Statement](#), [Safe & Legal Labor Update Report](#), and [SeaChange® Website](#).

9. Per the UN Guiding Principles on Business and Human Rights, does your company have a **[grievance/ complaints mechanism](#)** through which workers, including fishers in your supply chains, can raise concerns about human rights? If so, can they access this in their own language and in a way that allows grievances, or concerns, to be reported safely, in confidence and without intimidation? Have any human rights concerns connected with the Pacific tuna sector been reported via the company's complaints mechanism? Please provide details.

Access to grievance mechanism is embedded in both the [Business Ethics and Labor Code of Conduct \(CoC\)](#) applicable to all our suppliers and the [Vessel Code of Conduct \(VCoC\)](#) applicable to fishing vessels in our supply chain. Clause 10 of the CoC specifies a requirement for our suppliers to provide effective, accessible channels for workers to complain, make suggestions and lodge grievances and require such matters to be fully investigated, and result in swift, unbiased and fair resolution. A similar requirement is stated in Clause 10 of the VCoC.

Thai Union provides and promotes various internal and external grievance channels for our employees, suppliers' employees, or any whistle blowers who wish to report complaints and violations against our CoC. These are internal hotlines, welfare committees, suggestion boxes, and confidential email address (labor.coc [at] thaiunion.com), for example. Various grievance channels, as well as other platforms for worker voice, are described on the pages 15-16 of our [2017 UK Modern Slavery Act Statement](#). We are also in a process of launching a new global grievance mechanism accessible to all our employees and public whistle blowers. We support a culture of speaking up without fear of retaliation against those who report actual or suspected breaches, as indicated in our [Human Rights Policy](#) and the [CoC](#). To verify compliance, we annually conduct internal audits of all of our Thailand-based factories against the CoC and related Thai labor law. As part of the audit, we verify that: employees have access to procedures for filing complaints about discrimination; employees have access to appeal against unfair disciplinary actions; welfare committee is elected by employees; and that meeting is held regularly between welfare committee representative and the company's management.

As an additional oversight over our suppliers, we arrange annual social audits against our Codes, including the requirements on grievance channels. In particular, an audit program of vessels in our supply chain against the VCoC along with the Vessel Improvement Program (VIP) has begun in 2018. This program covers our global tuna supply chain, including those sourced from the Pacific, and Thai-flagged vessels.

In 2018, Greenpeace raised concerns on vessels from which Thai Union sources in the Pacific. These concerns have been investigated directly with the vessel owner, with audits conducted and an improvement plan put in place.

Finally, we advocate for stronger worker voice in Thailand by publishing the [Letter of Support Freedom of Association and the Rights of Workers](#) in May 2018, voicing our support for the Royal Thai Government's intentions to ratify ILO Conventions 87, 98, and 188 and our support for the establishment of the International Transport Workers' Federation (ITF) Fishers Rights Network (FRN) as the first democratic union for fishers in Thailand.

10. Do you have a corrective or **remediation plan** if instances of modern slavery are identified in your operations, or supply chains? Can you describe it?

Per our [Human Rights Due Diligence Framework](#), Thai Union commits to provide or facilitate access to effective remedies to affected rights holders in our operations and supply chain (Pillar 5 of the Framework). To verify our own operations' compliance, we annually conduct internal audits of all of our Thailand-based factories against the CoC and related Thai labor law. Relevant management team will implement time-bound corrective action plans for identified non-compliances, which will then be verified by our central internal audit team.

Similarly, we arrange various audit schemes of our suppliers to identify potential non-compliances against our CoC and related laws and regulations. As stated in our [Business Ethics and Labor Code of Conduct \(CoC\)](#), we will seek to work with our suppliers to resolve non-compliances as the first response to non-compliance. 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 suspension until proof of rectification is available.

In particular, an audit program of vessels in our supply chain against the VCoC along with the Vessel Improvement Program (VIP) has begun in 2018. This program covers our global tuna supply chain, including those sourced from the Pacific, and Thai-flagged vessels. Thai

Union commissions a rolling program of independent third-party auditing in its supply chains. Audits will be completed in accordance with industry best practice standards. Each audit will result in an audit report that will assess compliance of the vessel(s) with the VCoC and provide an evaluation if an improvement program is needed to be initiated. The presentation of the information on the results of the audit will enable the vessel(s) to propose the corrective actions that they are required to complete as part of the improvement program, in agreement with the auditor. These corrective actions will have the expected timescales of completion outlined and agreed. Guidance to the Thai Union Fishing Vessel Improvement Program and Code of Conduct can be found [here](#).

11. How many **instances** of modern slavery has your company **identified** in 2018 in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific? Do you know where they occurred and can you describe them? How did the company respond to address the issue(s)?

Thai Union's goal is to provide safe, legal, and freely-chosen employment in our facilities and supply chain. In addition, we aim to drive forward positive changes and work with all relevant stakeholders to eliminate human rights violations, including modern slavery, from the industry. As previously stated, we set five milestone targets to be achieved by 2020, related to fair and legal employment, workers empowerment, traceability, compliance with Thai Union's Codes of Conduct, and stakeholder engagements. We regularly monitor and publish progress towards meeting our targets via Thai Union's Annual Report, Annual Sustainability Report, UK Modern Slavery Act Transparency Statement, Safe & Legal Labor Update Report, and SeaChange® Website.

Thai Union has implemented a number of initiatives and policies that are designed to combat modern slavery in the global seafood industry. Detection of human rights violations in our operations and supply chain forms the Pillar 3 "Detect" of our Human Rights Due Diligence Framework. Our processing factories regularly receives third-party audits against globally recognized social standards, including modern slavery, such as ETI Base Code, Amfori BSCI Code of Conduct, and Sedex. We also have rolled out grievance mechanism across all sites.

For fishing vessels in our supply chain including those from the Pacific region, we are currently rolling out our Fishing Vessel Improvement Program and Vessel Code of Conduct (VCoC), which focus on the recruitment and treatment of workers, stipulating protocols on employee welfare, benefits, wages, age, the right to freedom of association, the right to collective bargaining, and non-negotiable frameworks for health and safety. The VCoC includes a commitment by suppliers to develop a Vessel Improvement Program (VIP) to meet the Code of Conduct and address any non-compliance issues identified to be of a major or critical concern. In particular, the ongoing VCoC audit program of vessels currently covers our global tuna supply chain, including those sourced from the Pacific, and Thai- flagged vessels. Audits of tuna vessels will be completed for the Pacific, Atlantic, and the Indian Oceans.

To help drive change throughout the fishing industry, we released an aggregate result of our first industry collaborative third-party audit on some Thai commercial fishing vessels in our supply chain. The results of the audit have been used to put in place vessel improvement projects and develop a Capacity Building Program in Thailand, being run in collaboration with the ILO/EU “Ship to Shore Rights” Project and the International Transport Worker’s Federation (ITF) to raise the standard of suppliers to Thai Union. Aggregate results of the ongoing VCoC audits will be published in the 2018 Annual Sustainability Report.

Reporting

12. Does the company communicate, or **report**, externally on steps taken to address modern slavery? If yes, please provide details.

Transparency is one of the key Operating Principles in implementing our Human Rights Due Diligence Framework. All activities on our efforts to uphold human rights, including eradication of modern slavery, are regularly reported in Thai Union's Annual Report, Annual Sustainability Report, UK Modern Slavery Act Transparency Statement, Safe & Legal Labor Update Report, and SeaChange® Website. We published progress report on the Greenpeace agreement to drive positive changes in the seafood industry by tackling environmental and labor rights issues in our fishery supply chain.

In June 2018, we released an aggregate result of our first industry collaborative third-party audit on some Thai commercial fishing vessels in our supply chain. Aggregate results of the ongoing VCoC audits will be published in the 2018 Annual Sustainability Report. Our transparency in releasing these results is focused on helping to drive change throughout the industry.

As previously mentioned, an ethical trade consultancy firm Impactt has conducted an independent evaluation of our Ethical Migrant Recruitment Policy. Findings will be published around January 2019 and will be used as evidence base to inform areas for internal improvement as well as draw lessons learned for other employers interested in ethical recruitment.

Finally, we are currently updating a public statement in compliance with the requirements under the California Transparency in Supply Chains Act 2010, for our US subsidiary Tri-Union Seafoods, LLC., which manufactures and distributes canned seafood under 'Chicken of the Sea' brand.

Other information

13. Has your company encountered **obstacles or challenges** in implementing its human rights commitments, taking practical action against modern slavery in tuna supply chains and/or in relation to any of the areas mentioned above? If so, please explain and provide details of any strategies to overcome them.

Activities, particularly ones at sea, can be hard to monitor, which makes them difficult to regulate. Still, a lot of progress has been made such as through our ongoing VCoC audit program, a digital traceability pilot, and an observer program for longline fishery.

In 2017, we worked with stakeholders to launch a digital traceability pilot program to deliver worker voice and connectivity at sea, boosting human rights in the seafood industry. The pilot tested scalable platforms for electronic Catch Data and Traceability systems that utilize mobile applications and satellite connectivity. As part of the pilot crew members and captains had access to "Fish Talk" chat applications that allow them to communicate with loved ones on shores. Subsequent to the trial, an independent evaluation was conducted and published. In particular, it found that the trial greatly

improved crew morale and retention on board the vessels. Furthermore, the Royal Thai Government subsequently issued a new regulation requiring Thai vessel owners operating outside of national waters to provide a satellite communication system and device onboard for workers at sea, similar to what was trialed in the company's pilot program.

Furthermore, Thai Union notes that longline fishing presents a risk for the incidental catch of non-target species, and current practices increase risk for illegal practices such as IUU fishing and human rights abuses. Under our joint agreement with Greenpeace in 2017, Thai Union commits to employ 100% observer coverage (human and electronic) on the longline vessels it sources from by 2020. Thai Union is working with partners on human and electronic observer programs for longline vessels. Progresses against the Greenpeace agreement can be found [here](#).

14. Does the company participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing, eg:

- a) [Seafood Task Force](#);
- b) [Bali Process Government and Business Forum](#);
- c) [Tuna 2020 Traceability Declaration](#); and
- d) [other](#)?

[If yes, please provide details.](#)

No single entity can do it alone. Collaboration is key. To serve as a truly effective change leader, Thai Union aligns its sustainability with globally recognized collective sustainability priorities and programs. Thai Union participates in Seafood Task Force, Bali Process Government and Business Forum, and Tuna 2020 Traceability Declaration, and other initiatives as outlined below:

- The United Nations (UN) Global Compact – Thai Union has been a member of the United Nations (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 a number of 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. We report annually on our progress in our sustainability reports.

- International Labour Organization (ILO)'s "Ship to Shore Rights" Project – The Project works with the Thai Government, employers' organizations, workers' organizations and buyers towards the prevention and reduction of unacceptable forms of work in Thailand's fishing and seafood industries. Thai Union has been an active partner of the Project, particularly under the objective of improving compliance with the Fundamental Principles and Rights at Work through implementation of the Good Labour Practices (GLP). We previously conducted GLP training in our own facilities.
- The Mekong Club -In August 2018, Thai Union announced a support for the Mekong Club Business Pledge Against Modern Slavery. As one of the signatories, Thai Union declares a commitment to work to collect and share relevant information to inform business decisions, promote education training, and contribute to the development of tools to help prevent and address modern slavery in Asia.
- 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, Unregulated (IUU) products and any form of modern slavery in the supply chain.
- Global Sustainable Seafood Initiative (GSSI) and the Consumer Goods Forum's Sustainable Supply Chain Initiative (SSCI) – In May 2018, the SSCI and GSSI announced their collaboration to provide benchmark and recognition tool for social compliance schemes in the seafood sector. Thai Union's Global Director of Sustainability Dr. Darian McBain is a board member of the GSSI and been actively contributing to this initiative.

- Global Dialogue on Seafood Traceability (GSDT) - business-to-business platform established to advance a unified framework for interoperable seafood traceability practices.
- The Marine Stewardship Council (MSC) Stakeholder Advisory Council - we are member of the Council whose role is to provide advice to the MSC Board and input into the MSC's review processes on both environmental and social dimensions. Thai Union inputted to the public consultation to the labour requirements for fisheries and supply chain and attended meetings and forum to develop ideas on the topic of labor requirements. The MSC is working to extend its existing provisions on forced labour and provide greater assurance that forced and child labour violations are not taking place in fisheries and supply chain companies that hold MSC certificates.

15. Please provide any **other information** about your company's policies and practices on human rights that may be relevant.

We have embraced our role as a leader for positive change as one of the largest seafood companies in the world. This means putting sustainability at the heart of our business. Our works on sustainability including those pertaining to the issue of modern slavery have earned us awards and recognitions by leading organizations around the world. The latest list of awards and recognitions can be found [here](#).

Most recently, Thai Union was highly commended for its work on ethical recruitment and migrants' rights by Thomson Reuters Foundation, the philanthropic arm of the world's largest news and information provider, and judges for the Stop Slavery Award during the 2018 human rights forum Trust Conference. Thai Union was one of six companies shortlisted for the foundation's annual Stop Slavery Award. Nominees also included Apple and Unilever, among others, representing a range of industries from seafood and fashion to financial services and technology.

Thai Union's efforts and international advocacy to combat modern slavery and forced labor were also recognized recently as Thai Union was invited to participate in a high-level panel at the United Nations General Assembly, with Dr. McBain presenting the company's actions and experiences in front of the world's leadership on this agenda in New York City.

Finally, Thai Union was recently rated number one in the world in the food products industry in the 2018 Dow Jones Sustainability Index (DJSI). Individually, Thai Union had industry best-in-class 100th percentile rankings for Codes of Business Conduct, Materiality, Health and Nutrition, Human Rights, Supply Chain Management, Risk and Crisis Management, Packaging, Water-Related Risks, Genetically- Modified Organisms, and Talent Attraction and Retention. It was the fifth consecutive year Thai Union was named to the DJSI.

Thank you.

Further information and guidance:

- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UK Modern Slavery Act \(2015\)](#)
- [Californian Transparency in Supply Chains Act](#)
- [ILO Forced Labour Convention, 1930 \(No. 29\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [ILO Work in Fishing Convention, 2007 \(No. 188\)](#)
- [Seafood Task Force](#)
- [Bali Process Government and Business Forum](#)
- [Tuna 2020 Traceability Declaration](#)
- [Mapping of Sustainable Development Goals to human rights instruments and issues](#)