

Thai Union Fishing Vessel Code of Conduct and Improvement Program v3.0



10. Workers have access to fair procedures.

The vessels have fair and transparent procedures to ensure that the ending of contracts, grievances and disciplinary actions are conducted fairly and confidentially. Incidences are dealt with without repercussions for the crew member and are monitored as they progress to an unbiased resolution.

- 10.1 There is a system to effectively monitor and report concerns and grievances that allows crew/workers to raise issues without being put at risk of negative repercussions.
- 10.2 The procedures for the ending of contracts, grievances and disciplinary actions are widely communicated to the crew prior to departure and any questions are addressed at an appropriate time such as a meeting or during a training session.
- 10.3 The procedures include, but are not limited to, a description of: confidentiality, channels of reporting, a mechanism to report to someone other than their direct supervisor, how to follow up on a reported grievance, how crew can monitor the status of their complaint, prohibiting retaliation, and an appeal system for unfavorably resolved complaints and disciplinary actions. Records of reported grievances and any disciplinary actions shall be maintained.
- 10.4 There shall be no unlawful disciplinary action used such as imposing work or unlawful fines as a means of disciplinary action against crew.
- 10.5 Grievance matters are investigated, recorded, and result in timely unbiased and fair resolution.
- 10.6 Auditors or inspectors are able to interview workers in a safe environment.

11. Business is conducted in a manner that embraces sustainability and reduces environmental impact.

Thai Union encourages all fishing vessels to operate responsibly and in a manner that respects the ecosystem and reduces impact on the marine environment. Vessels should operate best practice standards and comply with applicable conventions and laws.

- 11.1 Vessels and fishing companies should be able to demonstrate that they meet the conservation management measures of the Regional Fisheries Management Organization, the laws of the flag state and/or any relevant international convention.
- 11.2 An effective environmental management plan should be in place to manage legal compliance as well as, but not limited to, the use of hazardous chemicals; waste, wastewater and air pollution generation; water and energy consumption.
- 11.3 Training is provided to relevant personnel to ensure knowledge of and compliance with necessary legal requirements, resolutions and best practices pertaining to environmental management.
- 11.4 Tuna vessels must comply with the conservation measures of the International Seafood Sustainability Foundation.

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12. Progress and compliance are monitored.

Compliance with the VCoC is reinforced through monitoring and checks against its clauses. A VIP is initiated if any major or critical non-compliances are identified.

- 12.1 Work activities/improvement plans should be monitored against this VCoC and recruitment mapping exercise.
- 12.2 Reviews of the systems and policies should be completed regularly and reported on a self-assessment checklist that is generally implemented at least once every 365 days.
- 12.3 No crew or employee shall be disciplined or dismissed for providing truthful information or assisting in the application of this VCoC.
- 12.4 A VIP is to be initiated if 'Areas For Continuous Improvement' are identified during an audit against this VCoC and recruitment mapping exercise.
- 12.5 A VIP will include documentation of the actions identified, milestones, and time scales.

Recruitment Mapping Exercise

The purpose of the recruitment mapping exercise is to extend the audit program of the VCoC to include additional clauses and indicators specifically relating to the ethical recruitment of fishers. This addition aims to provide clear guidance on how recruitment should be conducted in the fishing sector and remains aligned with new codes/standards. An example is the Seafood Taskforce Vessel Auditable Standard: 14. Private Employment Agencies & Recruiters, and this extension to the VCoC ensures that the content is covered by the Thai Union program in the following documents: the VCoC, the Guidance Document and Auditor procedures and handbooks.

The recruitment mapping exercise can be conducted at a fleet level rather than a vessel level. And as such can be completed as a separate but complementary part of an audit. The use of employment agencies/arrangements does not result in voiding obligations to workers under applicable national labor and social security laws.

- RM.a There is an established due diligence process for all recruiters/agencies.
- RM.b There is a contract in place with the recruiter/agency which sets out the agreed terms and conditions for the arrangement for the provision of recruits.
- RM.c The labor recruiter or subcontracted agency is operating legally and can demonstrate that they are practicing responsible recruitment.

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The channels for reporting on breaches and/or complaints, appeals, and feedback are as follows:

Address: 72/1 Moo 7, Sethakit 1 Road, Tambon Tarsrai,
Amphur Muang, Samutsakorn 74000, Thailand
Telephone: +66 (0) 3481-6500 Fax: +66 (0) 3481-6499

Confidential email: VesselCode@thaiunion.com

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Failure to comply with this Code of Conduct or recommended remedial action will result in supplier contract termination and legal action, without recourse.

Announced on December 19, 2023

A blue ink signature of Mr. Cheng Niruttinanon, consisting of several fluid, connected strokes.

**Mr. Cheng Niruttinanon
Executive Chairman
Thai Union Group PCL**

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

**Mr. Thiraphong Chansiri
President & CEO
Thai Union Group PCL**

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Acknowledgement and Acceptance

This is to certify that I have fully read and understood the Thai Union Vessel Code of Conduct. As an authorized representative of the company, I hereby commit my company and/or vessel(s) to comply with this Code of Conduct, including the diligent implementation of any Areas For Continuous Improvement identified pursuant to a VIP.

Supplier: _____

Address: _____

Representative: _____

Signature: _____

Date: _____