

## **Business Code of Conduct and Practices, Labor Practices, and Social and Environmental Risk Management for Suppliers of Thai Union Feedmill Public Company Limited**

Thai Union Feedmill Public Company Limited has established additional specific requirements in connection with the implementation of the Aquaculture Stewardship Council (ASC) Feed Standard. All operators providing raw materials to the Company are expected to give due consideration to, and comply with, guidelines relating to labor practices as well as social and environmental risk management.

### **Fundamental Principles**

As a manufacturer and distributor of aquafeed, Thai Union Feedmill Public Company Limited, with its head office located at 89/1 Moo 2, Kalong Sub-district, Mueang Samut Sakhon District, Samut Sakhon Province, and a branch located in Ranot District, Songkhla Province, intends to obtain certification under the ASC Feed Standard, also known as ASC Feed Mill. This globally recognized international standard for aquafeed production signifies that the production process uses high-quality, sustainably sourced raw materials to prevent environmental damage.

Accordingly, Suppliers are required to cooperate by providing information to facilitate an assessment of their facilities, including evaluations extending to the primary source of raw materials. Furthermore, Suppliers must comply with the Policy on No Deforestation and land-use change by January 31, 2025. This must be done in strict accordance with the Thai Union Group: Policy on No Deforestation, as specified on the website [www.thaiunion.com](http://www.thaiunion.com).

The fundamental principles forming the basis of our practices are internationally recognized standards that have been integrated into our operations. These principles are detailed as follows:

1. Licensing and Legal Compliance
2. Compliance with Relevant Labor Laws
3. No Participation in or Support for Forced, Bonded, or Involuntary Labor
4. Protection of Children and Child Labor
5. Non-discrimination
6. Safe and Hygienic Working Environment
7. Freedom of Association and Collective Bargaining
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## **Business Code of Conduct and Practices, Labor Practices, and Social and Environmental Risk Management for Suppliers of Thai Union Feedmill Public Company Limited**

### **1. Licensing and Legal Compliance**

Suppliers must comply with all laws and regulations in the countries where they operate and adhere to relevant international laws and regulations (e.g., trade sanctions, export controls, and reporting obligations), data protection, and anti-monopoly/competition laws.

### **2. Compliance with Relevant Labor Laws**

Suppliers must comply with all relevant labor laws and regulations in the countries where they operate and adhere to relevant international laws and regulations (e.g., the labor laws of Thailand).

### **3. No Participation in or Support for Forced, Bonded, or Involuntary Labor**

Work must be voluntary and free from forced labor. The use of forced labor in any form, including indentured or bonded labor, is not permitted. Psychological and physical coercion, slavery, and human trafficking are prohibited.

- 3.1 Suppliers must have employment policies, procedures, and employee training to ensure that workers are employed freely and equitably and are free to resign voluntarily.
- 3.2 Employees must have freedom of movement and shall not be confined or detained within the Supplier's facility.
- 3.3 Employees shall not be forced to surrender their identity documents. In cases where the retention of identity documents is required by law, the Supplier must establish an agreement with the worker to ensure they have access to their own documents, and such retention shall not be used as a condition to prevent the worker from resigning. Identity documents must be returned to the worker immediately upon written request or at the end of employment.
- 3.4 Suppliers must avoid or minimize providing wage advances or loans to workers, or any other actions that could result in binding a worker to the employer due to outstanding debt.
- 3.5 The recruitment of employees must not involve withholding any part of the employee's salary, property, or benefits.

### **4. Protection of Children and Child Labor**

No child under the age of 15, or under the minimum age for work as stipulated by the labor laws of that country, shall work or be employed in a business under the Supplier's control. Suppliers must ensure that no employee under the age of 18 works in hazardous areas. Furthermore, their working hours must not exceed eight hours per day, and they must not work during nighttime hours (22:00-06:00).

- 4.1 Employment policies must specify a clear minimum age for employment, along with effective procedures for verifying the age of workers (e.g., government-issued identification cards or passports).

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- 4.2 Young workers must be cared for and protected in matters of health and safety under all circumstances. Such measures include prohibiting young workers from performing hazardous work or working during nighttime hours and ensuring they receive special care and supervision.

### **5. Non-discrimination**

All workers must be treated with equal respect and dignity. There shall be no physical, sexual, psychological, or verbal abuse, intimidation in any form, or harsh and inhumane treatment. There shall be no discrimination in any aspect of employment, including recruitment, compensation, advancement, discipline, termination, or retirement. Discrimination based on class, national origin, race, religion, age, marital status, sexual orientation, union membership, political affiliation, health, disability, or pregnancy shall not be permitted. The rights of workers who are most vulnerable to discrimination must be given the utmost importance.

- 5.1 Suppliers must have a policy prohibiting all forms of discrimination based on class, national origin, race, religion, age, disability, sex, marital status, sexual orientation, union membership, political affiliation, health, disability, or pregnancy, and must have procedures in place to inform workers of their rights.
- 5.2 There shall be no mandatory pregnancy testing or other forms of health screening that could result in discriminatory practices.
- 5.3 Suppliers shall not terminate, demote, or reduce the benefits of a worker as a result of pregnancy. Suppliers must allow the worker to return to their original position after childbirth.
- 5.4 Workers shall be given equal opportunities to fully develop their knowledge, skills, and abilities related to their work.

### **6. Safe and Hygienic Working Environment**

Suppliers must provide a safe and hygienic working environment for all workers to prevent accidents and injuries arising from, occurring during, or resulting from their operational duties.

- 6.1 Suppliers must identify, eliminate, and control hazards that pose a risk to workers, other persons in the workplace, or the environment.
- 6.2 Suppliers must have clear and effective policies and procedures for occupational health and safety, which must be updated as appropriate.
- 6.3 Occupational health and safety policies and procedures, including fire drills, must be widely communicated, and appropriate training must be provided to workers.
- 6.4 Workers and any external parties entering the facility must be informed of potential hazards in the workplace and must be provided with adequate information, including personal protective

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equipment (PPE), to avoid or mitigate such hazards.

- 6.5 All personnel who enter the premises or are responsible for handling goods must be informed of the appropriate operational procedures for health and safety.
- 6.6 Personal protective equipment must be provided to all personnel at the employer's expense. Workers shall receive the necessary training to perform their duties safely.
- 6.7 Working conditions and worker accommodation must be maintained in a safe and hygienic state, meeting the following minimum welfare standards: clean drinking water; sufficient and clean toilets; good ventilation; necessary fire escapes and safety equipment; first-aid equipment; access to emergency medical care; a hygienic dining area; and adequate lighting in the workplace.
- 6.8 Suppliers must ensure that pregnant workers who have notified the Supplier of their pregnancy shall not work in hazardous areas, perform physically demanding work, or work with biological, chemical, or other substances that may be hazardous to the reproductive system. Furthermore, Suppliers must ensure that pregnant workers do not have excessively long working hours and are not permitted to work night shifts. Suppliers must comply with domestic laws aimed at protecting the health and safety of pregnant workers.

### **7. Freedom of Association and Collective Bargaining**

All workers must have the freedom to exercise their right to establish and/or join labor unions and have the freedom to bargain collectively as permitted by law. The right of workers to freedom of association and collective bargaining must be respected and recognized. Workers shall not be intimidated or harassed for exercising their right to join any organization.

- 7.1 Managers, supervisors, and security personnel must be trained to respect the right of each worker to freely join any organization.
- 7.2 Suppliers must inform workers of their rights, ensuring they can exercise them confidently and without obstruction from other workers or management.
- 7.3 The right to strike shall be recognized as an integral component of the freedom of association for workers and their organizations, and no worker shall face retaliation for exercising such right.

### **8. Transparent Employment Contracts**

Employment must be based on freely agreed-upon terms, with documented employment agreements that comply with legal requirements. Suppliers must adopt and implement policies that respect the standard rights of permanent, temporary, and outsourced workers. At a minimum, these policies must protect the rights of workers as stipulated in their employment contracts and in accordance with local laws and regulations, national labor laws, social security laws, and collective bargaining agreements.

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- 8.1 Key components of the employer-employee relationship, such as working hours, overtime, wages, benefits, leave, disciplinary systems, and grievances, must be (1) freely agreed upon by both parties, (2) recorded in writing, and (3) signed by the employer and the employee.
- 8.2 Workers must clearly understand the terms and conditions of their employment, which shall be explained verbally and, if necessary, in a language they can understand.
- 8.3 Changes to key components of the employer-employee relationship must be agreed upon in writing by both parties and must be in a language the worker can understand.

### **9. Legal Wages**

All workers must receive compensation, including wages, overtime pay, and benefits, that meets or exceeds the minimum standards stipulated by the national laws of their country of employment and any applicable collective agreements.

- 9.1 Workers must receive a pay statement for each pay period. It must clearly detail their compensation, including wages, benefits, incentives/bonuses, and any deductions. The pay statement must be in a language the worker can understand.
- 9.2 Compensation must be paid on time and in accordance with the pay statement.
- 9.3 All work must be compensated at a rate no lower than the minimum required by law and industry standards and must be in accordance with the employment contract.
- 9.4 Compensation terms established through legally recognized collective bargaining agreements must be upheld and adhered to.
- 9.5 Legally mandated deductions, such as taxes or social security, must be deposited each pay period into legally specified accounts or with the legally designated agencies. Other deductions, beyond those required by law, may only be made if they are legally permissible and have received prior written consent from the worker.
- 9.6 Thai Union Feedmill Public Company Limited is committed to the "elimination of recruitment fees" charged to migrant workers. Specifically, Thai Union Feedmill Public Company Limited will bear the costs for recruitment services. We encourage our Suppliers to consider the principle of abolishing recruitment service fees and to adapt it appropriately to their specific situations.

### **10. Working Hours**

All workers must have reasonable working hours and shall not be required to work in excess of the maximum hours for regular and overtime work as stipulated by the national laws of the country in which they are employed. All overtime must be voluntary.



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- 10.1 Suppliers must have a clear policy on normal working hours and overtime, which includes a defined process for assigning overtime that requires prior consent from the worker.
- 10.2 Workers must have the right to at least 24 consecutive hours of rest in every seven-day period (except for certain types of work where national law permits an alternative arrangement by mutual agreement). If a worker is required to work on a designated rest day to ensure continuity of production or services, they must receive a substitute day off of equivalent duration or be compensated at the rate prescribed by law.
- 10.3 All overtime must be voluntary, even if a worker has agreed to an overtime provision in their employment contract.
- 10.4 Overtime compensation must not be less than the rate prescribed by law.

### **11. Disciplinary Practices**

Suppliers must establish a written "Disciplinary and Penalty" policy that complies with all applicable laws and regulations and is communicated to all workers. Suppliers shall also maintain a documented disciplinary and penalty management procedure available for review. The use of corporal punishment, verbal abuse, sexual harassment, or any form of mental or psychological coercion is strictly prohibited, and workers must have access to a grievance process if they believe they have been unjustly penalized.

### **12. Employee Grievance Mechanism**

The Supplier's workers must be provided with a mechanism to file grievances on various concerns, and all workers who raise such issues must be protected from retaliation or reprisal. To this end, Suppliers must undertake the following actions:

- 12.1 Have clear and effective practices and policies that demonstrate a commitment to conducting business with integrity and include provisions for anti-bribery, gifts, and hospitality. Such practices or policies must comply with competition laws and be focused on avoiding conflicts of interest.
- 12.2 Provide training and conduct risk assessments regarding compliance requirements, and establish penalties and remedial actions for instances of non-compliance.
- 12.3 Have procedural mechanisms to ensure that all confidential business-related and product-related information is stored securely, and that access to such information is restricted on a need-to-know basis only.
- 12.4 Workers must have access to a channel through which they can report issues or file grievances without fear of retaliation or reprisal.

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### **13. Provision of Safe, Suitable, and Hygienic Accommodation**

Suppliers must ensure that all workers are provided with healthcare and safe and suitable accommodation. Any employer-provided dormitories must be clean, safe, supplied with necessary amenities, and not overcrowded. They must have adequate and clean toilets and bathing facilities. Dormitories must be also equipped with appropriate emergency equipment, such as fire extinguishers, emergency alarms, and emergency lighting. Fire drills must also be conducted regularly.

### **14. Community Engagement**

Suppliers must be aware of their responsibility to prevent adverse community impacts that may arise from their operations, such as pollution from noise, odors, and dust. Suppliers shall develop monitoring plans and implement any necessary measures to mitigate the impacts in collaboration with the local community where the Supplier's workplace is located. This includes prioritizing local hiring, sourcing materials or services from the community where available, and maintaining a grievance mechanism that is accessible to the community.

### **15. Respect for the Rights, Culture, and Land of Indigenous and Tribal Peoples**

As many of the world's resources are located in areas under the stewardship of indigenous and tribal peoples, these groups often face exclusion and are vulnerable to the impacts of business activities. However, businesses can build strong relationships with communities and achieve long-term success by engaging with indigenous and tribal peoples, with reference to the ILO Indigenous and Tribal Peoples Convention, 1989 (No. 169) and the ILO Indigenous and Tribal Populations Convention, 1957 (No. 107).

### **16. Compliance with Relevant Environmental Laws**

Business operations must be sustainable and minimize environmental impact. Operations, procurement, production, distribution, and services must be conducted with the objective of protecting and preserving the environment and must comply with environmental laws and regulations.

- 16.1 Business operations must have all legally required permits.
- 16.2 Suppliers must provide training to all personnel to ensure they are aware of and comply with various legal permits.
- 16.3 Suppliers must have an effective environmental management plan. This plan must ensure compliance with legal requirements, including those for the use of hazardous chemicals, disposal of waste, wastewater and air pollution, and the use of water and energy.

### **17. Water Use**

Currently, the demand for fresh water is increasing due to several factors, namely, changes in water availability, population growth, urbanization, rising incomes, and shifts in consumption patterns. Agricultural production is a primary industrial sector for water consumption. Therefore, Suppliers must be aware of their water consumption and take action to improve water use efficiency in their production processes.



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For example, they must identify their water sources and must develop and implement effective water conservation and reduction plans.

### **18. Waste Management**

Effective waste management promotes the efficient use of resources by reducing the unnecessary disposal of materials. It also ensures that hazardous waste is handled properly to prevent harm. Therefore, Suppliers shall aim to reduce waste and, where reduction is not feasible, implement methods for reuse or recycling. All waste must be stored and disposed of safely and responsibly, with particular attention given to waste containing substances harmful to human health or the environment. Suppliers must obtain all legally required permits for the storage and/or disposal of sewage and unused materials.

### **19. Wastewater Management**

Wastewater, defined as liquid waste generated from a Supplier's production processes discharged into water bodies (e.g., rivers, lakes, marshes) or drainage systems, can pose significant risks to human health and the environment if not managed properly. Therefore, Suppliers must have processes in place to prevent negative impacts. These processes must include identifying all effluent sources and volumes, employing legally compliant treatment methods, and implementing a comprehensive wastewater management plan to mitigate adverse effects on receiving water bodies.

### **20. Energy Consumption**

The energy consumed in the Supplier's production processes represents not only an economic cost but also contributes to the depletion of finite natural resources. Therefore, it is essential that energy is used as efficiently as possible. Suppliers must identify all energy sources used in their operations—such as diesel, gasoline, natural gas, electricity, and other sources—and must develop and implement an energy reduction plan to improve overall energy efficiency.

### **21. Presence of Genetically Modified Organisms (GMOs) or GMO-derived Components in Products**

Suppliers are required to disclose the presence of any Genetically Modified Organisms (GMOs) or GMO-derived components in the products delivered to Thai Union Feedmill Public Company Limited upon each delivery or when requested.

### **22. Disclosure of Active Ingredients and Quantities of Antibiotics or Other Medicated Feed Additives in Products**

Suppliers must disclose all active ingredients and their quantities (in mg or g/kg of product) of any antibiotics or other medicated feed additives in each product lot delivered to Thai Union Feedmill Public Company Limited upon each delivery or when requested.

### **23. Suspension of Purchases from Suppliers Non-compliant with the Business Code of Conduct**

Suppliers must strictly adhere to the Business Code of Conduct and Practices of Thai Union Feedmill Public Company Limited. If a Supplier is found to be non-compliant with any provision, fails to adhere to the agreed-

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upon timeline, or has not declared their compliance with the Business Code of Conduct and Practices, they will be required to take immediate corrective action. Failure to remedy the non-compliance or to implement corrective actions as advised will result in the termination of the Supplier's contract and legal action.

### **24. Supplier Declaration of Compliance with Thai Union Feedmill Public Company Limited's Business Code of Conduct and Practices**

Suppliers must declare their compliance with Thai Union Feedmill Public Company Limited's Business Code of Conduct and Practices. This can be made via email or by inclusion in a contract that explicitly references this Business Code of Conduct.

### **25. Notification of Significant Changes**

Suppliers must promptly notify Thai Union Feedmill Public Company Limited of any significant changes that affect their compliance status with this Business Code of Conduct and Practices as specified in this document.

### **26. Requirement for Suppliers to Verify Their Own Suppliers' Compliance with the Business Code of Conduct and Practices**

Thai Union Feedmill Public Company Limited shall verify its Suppliers' compliance with the Business Code of Conduct and Practices. This verification includes all requirements stipulated in Section 2.1.1, which obligates Suppliers to effectively implement Thai Union Feedmill Public Company Limited's Business Code of Conduct and maintain a system to verify that the aforementioned Business Code of Conduct has been duly signed. This requirement is in accordance with ASC Feed Standard v1.1, Clause 2.1.1.

### **27. Continuous Monitoring of Progress and Compliance with the Business Code of Conduct and Practices**

Suppliers shall authorize Thai Union Feedmill Public Company Limited and its designated representatives to conduct various monitoring activities to verify compliance with this Business Code. This includes unannounced on-site inspections of production facilities and employer-provided worker accommodation, reviews of employment-related records, and private interviews with workers. Suppliers must maintain all documentation necessary to demonstrate compliance at their facilities. Except in cases of critical labor violations, Thai Union Feedmill Public Company Limited will endeavor to work with its Supplier to correct any initial instances of non-compliance.

Announced on September 1, 2025



Mr. Peerasak Boonmechote  
Chief Executive Officer  
Thai Union Feedmill Public Company Limited

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**Acknowledgement and Acceptance**

My signature below confirms that I, as an authorized representative of the undersigned Supplier, have read, understood and agree to fully comply with all terms set forth in this Business Code of Conduct and Practices, Labor Practices, and Social and Environmental Risk Management for Suppliers of Thai Union Feedmill Public Company Limited. I hereby commit, both personally and on behalf of the Supplier, to adhere to these principles. Thai Union Feedmill Public Company Limited reserves the right to amend this Business Code of Conduct at any time and will provide a revised copy to all Suppliers for their signed acknowledgment.

Supplier \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_

Representative's Name \_\_\_\_\_

Representative's Title \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

Company's seal