

Human Rights and Community Engagement

Introduction

Thai Union Feedmill Public Company Limited (TFM) is a manufacturer and distributor of aquaculture feed, operating manufacturing facilities in Thailand (Samutsakhon and Ranot) and Indonesia (PT Thai Union Kharisma Lestari, East Java). TFM's operations are embedded in coastal fishing and aquaculture communities, and its supply chain extends to fishmeal producers, aquaculture farmers, and agricultural commodity suppliers across the region.

Respecting human rights and contributing to community wellbeing are not incidental to TFM's business — they are central to how TFM operates and grows sustainably. This document sets out TFM's approach to human rights management and community engagement as of May 2026, including TFM's governance framework, due diligence processes, salient human rights issues, training and awareness, community investment, and stakeholder consultation practices.

TFM's human rights approach is grounded in the UN Guiding Principles on Business and Human Rights (UNGP), relevant ILO Conventions, the Thai Labour Standard (TLS 8001-2010), and the Thai Union Group SeaChange 2030 sustainability strategy. TFM's Human Rights Policy, published in February 2026, is available on TFM's website.

1. Human Rights Policy and Governance

1.1 Human Rights Policy

TFM has published a standalone Human Rights Policy (February 2026) that sets out the company's commitments to respecting and upholding the human rights of all people affected by its operations and value chain. The policy covers employees, migrant workers, supply chain workers, local communities, consumers, and vulnerable groups. It explicitly addresses prohibitions on child labour, forced labour, and discrimination, and establishes TFM's obligations under the UNGP and ILO Conventions.

The policy is reviewed and updated regularly to remain responsive to changes in operating context and international standards. In 2025, TFM updated its Supplier Business Ethics and Labour Code to ensure full alignment with Aquaculture Stewardship Council (ASC) requirements.

1.2 Board-Level Oversight

TFM's human rights practices are subject to board-level oversight through the Nomination, Remuneration, and Corporate Governance Committee (NRGC), a formally constituted Board committee effective from 4 December 2025 with a majority of independent directors. The NRGC Charter explicitly mandates the Committee to: "Oversee the Company's operation to ensure compliance with human rights policies."

At Thai Union Group level, human rights-related policies are reviewed by the Sustainable Development (SD) Committee, co-chaired by Thiraphong Chansiri (TFM Board Director and Group CEO) and the Chief Sustainability and Communications Officer. The SD Committee's mandate includes oversight of human rights-related policies as part of the SeaChange 2030 strategy. TFM, as a Thai Union Group subsidiary, operates within this oversight framework.

1.3 Day-to-Day Responsibility

Operational responsibility for human rights implementation is assigned across three functions:

- Senior Management — overall operational accountability and escalation to the NRGC
- Human Resources function — labour standards, grievance handling, training, and remediation
- Procurement and Supply Chain teams — embedding human rights requirements into supplier selection, monitoring, and auditing

These functions are supported by dedicated resources, internal controls, and defined reporting lines to the NRGC, ensuring that human rights risks are identified, managed, and escalated appropriately.

2. Human Rights Due Diligence

2.1 HRDD Process

TFM conducts ongoing Human Rights Due Diligence (HRDD) to identify, prevent, mitigate, and remediate human rights impacts across its operations and value chain. The HRDD process is designed to be systematic, transparent, and auditable, and is aligned with the UNGP and international labour standards including ILO Conventions and ASC and BAP certification requirements.

The HRDD process covers five stages:

Stage	Key Activities
Identify and Assess	Analyse human rights risks affecting employees, migrant workers, supply chain workers, local communities, consumers, and vulnerable groups. Considers severity, likelihood, and scope of potential impact across the value chain.
Prevent and Mitigate	Use assessment findings to update policies and operational procedures, strengthen supplier oversight, implement ethical recruitment practices, deliver training, and develop targeted measures for high-risk locations or groups.
Track Performance	Use KPIs and evaluation tools to verify whether implemented measures reduce risks. Conduct internal audits, external assessments, and supplier monitoring to ensure continuous compliance.
Communicate	Disclose assessment results, identified risks, actions taken, and performance outcomes to stakeholders through sustainability reports, business partner disclosures, and public channels.
Remediate	Where a human rights violation is identified, provide appropriate remediation to affected individuals, which may include compensation, operational adjustments, formal apologies, restoration of rights, or preventive actions.

2.2 HRDD Coverage Across the Value Chain

TFM's HRDD is applied not only to its own manufacturing operations but also across its broader value chain through an integrated supplier governance framework. This includes:

- Establishing human rights criteria for supplier selection
- Integrating labour and human rights requirements into procurement contracts
- Conducting risk assessments for specific raw material groups
- Performing risk-based supplier audits
- Monitoring compliance with ASC, BAP, SEDEX, and other relevant standards
- Providing training and capacity building for suppliers to raise shared standards

This approach enables TFM to identify, manage, and prevent human rights violations from the origin of the value chain through to end users.

3. Salient Human Rights Issues

TFM identifies and prioritises salient human rights issues — those presenting the most significant risk of adverse impact on people — based on severity of potential impact, likelihood of occurrence, and the vulnerability of affected groups. The table below presents TFM’s current salient human rights issues mapped to the relevant stages of the value chain.

Salient Issue	Priority	Value Chain Stage	Key Actions
Migrant worker rights — fair recruitment, freedom of movement, equal treatment	Highest	Own operations (Samutsakhon and Ranot)	Employer Pays Principle enforced; equal pay and conditions; Code of Conduct translated; 2 migrant worker representatives on Welfare Committee
Forced labour and debt bondage	High	Own operations and upstream sourcing	Prohibition in employment contracts; supplier audits under ASC/BAP/SEDEX; ethical recruitment policy
Child labour	High	Upstream aquaculture and agriculture supply chain	Strict prohibition; age verification for all workers; supply chain screening; ASC certification requirements
Freedom of association and collective bargaining	Medium–High	Own operations	Right to form unions recognised; Welfare Committee with employee representatives; grievance channels
Equitable compensation and wage fairness	Medium–High	Own operations and indirect employment	Market-benchmarked compensation; legal minimum wage compliance; equal pay commitments under non-discrimination policy
Community rights and environmental impacts	Medium	Host communities adjacent to operations	Quarterly community consultations; PDCA community programme management; accessible grievance mechanism

TFM's formal salient human rights issue prioritisation exercise is ongoing. TFM aims to publishing a more detailed assessment of the company's HRDD results in upcoming reporting cycle.

4. Key Human Rights Commitments

4.1 Labour Rights and Working Conditions

Every TFM employee receives a written employment contract covering working hours, compensation, benefits, leave entitlements, disciplinary measures, and grievance procedures. Employment is based on the free will of both parties. Employees are entitled to fair, competitive, and performance-based compensation, including wages, overtime pay, and statutory benefits, with payslips provided in a language they can understand.

TFM strictly prohibits forced labour, child labour, and any unlawful employment practice. Individuals under 15 years of age, or below the legal minimum working age in the relevant jurisdiction, are prohibited from employment. All operations adhere to Thai Labour Standards and applicable ILO Conventions.

Employees have the right to form or join labour unions and to engage in collective bargaining without intimidation or obstruction. Pregnant employees receive special protections including restricted access to hazardous tasks, heavy workloads, and night shifts.

4.2 Migrant Worker Rights

TFM promotes the lawful employment of migrant workers and ensures that recruitment is voluntary, free from debt bondage, and without unlawful retention of personal documents. TFM adheres to the Employer Pays Principle by covering all recruitment-related costs and encourages its business partners to implement the same standard to prevent forced labour and exploitation.

Migrant workers receive equal rights, compensation, benefits, and working conditions as Thai national employees. TFM provides translated versions of key workplace documents — including the Code of Conduct — to ensure migrant workers can understand their rights and obligations. Two migrant worker representatives sit on TFM's Welfare Committee, ensuring their perspectives are captured in the formal worker consultation process.

4.3 Non-Discrimination

TFM prohibits discrimination in recruitment, compensation, training, career advancement, discipline, or termination based on class, ethnicity, religion, age, disability, gender, sexual orientation, marital status, health status, pregnancy, union membership, or political opinion. Mandatory pregnancy tests or discriminatory health screenings are prohibited. All employees have equal opportunities for skills development and career advancement.

TFM has received the Human Rights Model Organization Award from the Department of Rights and Liberties Protection, Ministry of Justice, for five consecutive years (2021–2025), and the Outstanding Establishment Award for Labour Relations and Welfare from the Department of Labour Protection and Welfare for three consecutive years (2021–2023).

4.4 Supplier Human Rights Requirements

TFM requires all supply chain partners to comply with TFM’s Supplier Business Ethics and Labour Code of Conduct, which sets minimum standards for labour practices, social and environmental risk management, and ethical business conduct. Supplier selection criteria include legal labour practices, health and safety compliance, environmental management, and competitive procurement practices.

All TFM suppliers (100%, representing 80 suppliers) have formally acknowledged and signed the Supplier Code of Conduct. TFM regularly monitors and assesses supplier performance through assessments and onsite visits and requires corrective action plans where gaps are identified. Suppliers unable to meet required standards may receive formal warnings and, where non-compliance persists, face suspension or termination of the supply relationship.

5. Grievance Mechanisms

TFM maintains a robust and confidential grievance mechanism accessible to employees, workers throughout the supply chain, and external stakeholders. Complainants can raise concerns without fear of retaliation. All complaints are handled fairly, transparently, and without bias by the Audit Committee, which comprises independent directors.

Internal channels

- Verbal or written reports to trusted supervisors, the HR Manager, or the Company Secretary
- Suggestion and complaint boxes at all facilities
- HR Hotline
- Employee Welfare Committee
- Direct written communication to the Chairman of the Audit Committee

External channels

- Online whistleblowing form: <https://www.thaiunionfeedmill.com/th/corporate-governance/whistle-blowing-form>
- Mail: Thai Union Feedmill Public Company Limited, 89/1 Moo 2, Khlong Subdistrict, Mueang Samut Sakhon District, Samut Sakhon Province 74000

The Whistleblowing and Complaint Policy ensures appropriate protection for complainants, witnesses, and informants. TFM does not tolerate any form of retaliation. The full policy is available at: <https://www.thaiunionfeedmill.com/storage/download/corporate-governance/corporate-policies/20251211-tfm-whistle-blowing-policy-en.pdf>

In 2025, TFM received two whistleblowing reports through established channels. One concern related to procurement transparency was reviewed by the Internal Audit Department; no evidence of fraud or conflict of interest was found, and procurement procedures were reviewed and strengthened as a precautionary measure. The second case, related to suspected financial irregularities in a subsidiary, was investigated and appropriate actions taken. Zero complaints were received in 2023 and 2024.

6. Human Rights Training and Awareness

TFM is committed to building the awareness and capability of all employees, suppliers, and stakeholders on human rights. Training is delivered through multiple formats including online modules, onsite classroom sessions, and formal digital acknowledgement to ensure comprehensive, documented participation.

6.1 Employee Training

In 2025, 100% of TFM's directors, executives, and employees completed annual Code of Business Conduct and corporate governance training, which includes content on:

- Non-discrimination and equal treatment
- Migrant worker rights and ethical recruitment
- Prohibition of child labour and forced labour
- Freedom of association and collective bargaining rights
- Grievance mechanisms and whistleblowing channels
- Anti-corruption and conflict of interest provisions with human rights implications

In addition, 100% of employees received environmental management training covering responsible resource management, water stewardship, and TFM's environmental commitments.

6.2 Dedicated Human Rights Policy Training (2026)

Following the publication of TFM's standalone Human Rights Policy in February 2026, TFM is developing a dedicated human rights awareness and training programme covering the new policy framework. This programme, planned for delivery in 2026, will include:

- An overview of TFM's Human Rights Policy and UNGP alignment
- TFM's salient human rights issues and their relevance to each employee's role
- Practical guidance on identifying and reporting potential human rights concerns
- Specific modules for procurement, supply chain, and HR functions given their elevated exposure to human rights risks

TFM aims to disclose more details about this dedicated programme in its upcoming ESG reporting.

6.3 Supplier Training

TFM communicates its human rights and labour standards requirements to supply chain partners through its annual Supplier Connect event and ongoing supplier engagement activities, including the distribution and acknowledgement of the Supplier Code of Conduct. Building on the findings of its supplier due diligence programme, TFM aims to develop more targeted supplier capacity building initiatives focused on environmental, social and human rights topics that assessments identify as most material across its supply base. This will enable TFM to direct training and support where the need and potential impact are greatest, rather than applying a generic approach across all suppliers. TFM plans to formalise this targeted training programme and disclose participation data in the upcoming reporting cycle.

7. Stakeholder Consultation on Human Rights

7.1 Worker Consultation — Welfare Committee

TFM maintains a formal Welfare Committee comprising seven employee representatives, including two representatives from migrant worker communities. The Welfare Committee meets four times per year to provide a structured, confidential channel for employees to raise concerns related to welfare, workplace conditions, and quality of life.

Topics addressed by the Welfare Committee in 2025 included: employee amenities and welfare facilities; improvements to office and workplace facilities; and traditional and cultural activities for employee engagement. Feedback gathered is reviewed by the Human Resources function and incorporated into welfare policy reviews and operational improvement planning.

The inclusion of migrant worker representatives is a deliberate governance design reflecting TFM's recognition of migrant workers as its most at-risk workforce group, ensuring their perspectives are captured in formal consultation processes rather than relying solely on general employee channels.

7.2 Community Consultation

TFM's Community and Social Responsibility Working Team conducts regular on-site consultations with community leaders and representatives adjacent to TFM's facilities. Consultation participants include village heads, school directors, public health centre directors, community health volunteers, and elderly group leaders. Consultations form part of TFM's structured Plan-Do-Check-Act (PDCA) community programme management cycle.

Findings from community consultations are used to:

- Identify priority areas for community investment (education, health, safety, cultural heritage)
- Assess potential social and environmental impacts of TFM's operations on surrounding communities
- Monitor ongoing programme outcomes and adjust activities based on community feedback

8. Community Investment and Engagement

8.1 Approach

TFM’s community investment activities are guided by four strategic pillars: education and youth development; public health, safety, and quality of life; preservation of Thai cultural heritage and community resilience; and employee and community wellbeing. Programmes are planned and implemented through a PDCA management cycle informed by on-site stakeholder consultations.

TFM has received the CSR-DIW Honor Award for Corporate Social Responsibility from the Department of Industrial Works, Ministry of Industry, for four consecutive years (2022–2025), recognising TFM’s commitment to creating shared value for communities and the environment.

8.2 Investment Figures

TFM’s corporate donations over the past three years:

Year	Corporate Donations (THB)
2023	661,810.00
2024	416,843.03
2025	452,867.75

8.3 2025 Programme Highlights

In 2025, TFM’s community programmes reached four schools in Samut Sakhon and Songkhla provinces and multiple community health and welfare institutions. Key activities included:

Programme Area	Activities
Education and Youth	School perimeter fence repair and upgrade (65 community participants; community satisfaction 88.31%); National Children’s Day support including gifts, educational supplies, and employee volunteer coordination; donations of sound systems and sports equipment to schools
Community Health	Dental examination kits for children at Subdistrict Health Promotion Hospitals; patient beds, wheelchairs, and mobility aids for elderly individuals; adult diapers for dependent elderly residents; drinking water for Village Health Volunteer monthly meetings
Disaster and Humanitarian Relief	Essential supplies, food, drinking water, and hygiene kits for households affected by the Thailand–Cambodia border situation; flood relief support for Hat Yai, Songkhla Province
Marine and Environmental	Employee participation in Thai Union Group’s ocean plastic collection campaign, which collectively removed 265 metric tonnes of ocean-bound plastic in 2025; coastal and marine debris cleanup activities near TFM facilities
Community Economic Development	Training and capacity building for women’s and household groups on income generation and value-added product development from local resources; support for establishing a community welfare fund; animal feed donations to support school agricultural and aquaculture learning programmes
Cultural Heritage	Collaboration with educational institutions to support traditional Angklung music preservation

8.4 Outcomes

TFM monitors community programme outcomes through its PDCA management cycle, including pre- and post-programme assessments and community satisfaction evaluations. The 2025 school fence project achieved a community satisfaction score of 88.31%, exceeding the set target. Non-financial outcomes observed across 2025 programmes include improved safety and access within community schools, enhanced

quality of life for elderly residents, strengthened disaster preparedness, and increased employee engagement through volunteering.

9. Local Employment and Sourcing

TFM recognises that local employment is a direct and meaningful contribution to the economic wellbeing of the communities where it operates. TFM gives preference to hiring from the provinces and regions in which its facilities are located, and this is reflected in the workforce composition at each site.

Facility	Location	Local Employment (2025)
Samutsakhon (Mahachai)	Samut Sakhon Province, Thailand	57% of employees are residents of Samut Sakhon province
Ranot	Songkhla Province, Thailand	96% of employees are residents of Songkhla province
PT Thai Union Kharisma Lestari (TUKL)	East Java, Indonesia	19% from Lamongan district; 81% from wider East Java region

TFM’s local sourcing practices are governed by Thai Union Group’s SeaChange® 2030 responsible sourcing framework. Under the SeaChange® 2030 ‘Safe, Decent and Equitable Work’ commitment, the Group promotes fair and equitable treatment of workers across its operations and supply chain, and supports the economic development of local communities — a principle TFM operationalises through local hiring practices and a preference for engaging suppliers, contractors, and small-scale enterprise partners from the regions where its facilities are located.

TFM aims to formalise a TFM-level local employment and procurement preference statement for publication in its 2026 reporting cycle.

10. Employee Volunteering

TFM actively promotes and financially supports employee participation in community and social responsibility activities. Volunteering activities are coordinated by TFM's Employee Relations function. Activities in 2025 included:

- Thai Union Group's ocean plastic collection campaign (265 metric tonnes collectively removed)
- National Children's Day event coordination and activity support at local schools
- Disaster relief distribution for communities affected by the Thailand–Cambodia border situation
- Coastal and marine debris cleanup activities near TFM's Samutsakhon and Ranot facilities

TFM aims to establishing a more formal employee volunteering program in the coming years.