

Thai Union Group

Business Ethics and Labor Code of Conduct

Introduction

Thai Union Group Public Company Limited and its subsidiaries, hereafter referred as Thai Union Group, strive to conduct business with integrity and with respect for all those whom our activities affect. This reputation is an asset, just as valuable as our people and our brands.

This Code of Conduct embodies our commitment to conduct business with integrity, openness, and respect for universal human rights and core labor principles throughout our operations.

Thai Union Group expects the highest standards of behavior from all our workers and those with whom we do business. They must follow these principles.

The channels for reporting on breaches are as follows :

- Supervisor or Senior Management
- Suggestion Box
- Hot Line + 66(0)-6 1417-2752
- Email labor.CoC@thaiunion.com

Standard of Conduct

We conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees.

We shall similarly respect the legitimate interests of those with whom we have relationships

Obeying the law

Thai Union Group and employees are required to comply with the laws and regulations of the countries in which we operate.

Employees

Thai Union Group is committed to diversity in a working environment where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of our company. Our Labor Code of Conduct principles are

- Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance.
- All workers are treated fairly with respect and dignity.
- Work is conducted on a voluntary basis with no forced or compulsory labor.
- All workers are of an appropriate age.
- All workers are paid fair wages.
- Working hours for all workers are reasonable.
- All workers are free to exercise their right to join all labor activities as per permitted by law.
- Workers' health and safety are protected at work.

- Workers have access to fair procedure.

Consumers/Customers

Thai Union Group is committed to providing branded products and services which consistently offer value in terms of price and quality, and which are safe for their intended use. Products and services will be accurately and properly labeled, advertised and communicated.

Shareholders

Thai Union Group will conduct its operations in accordance with internationally accepted principles of good corporate governance. We will provide timely, regular and reliable information on our activities, structure, financial situation and performance to all shareholders.

Business Partners

Thai Union Group is committed to establishing mutually beneficial relations with our suppliers, customers and business partners. In our business dealings we expect our partners to adhere to business principles consistent with our own.

Community Involvement

Thai Union Group is strives to be a trusted corporate citizen and, as an integral part of society, to fulfill our responsibilities to the societies and communities in which we operate.

The Environment

Thai Union Group is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business.

Product Quality and Responsible Innovation

Products and services are delivered to meet the specifications and quality and safety criteria specified in the relevant contract documents and are safe for their intended use. Research and development are conducted responsibly and are based on good clinical practice and generally accepted scientific, technological and ethical principles.

The quality of products is the responsibility of every employee whom is involved in the production process, quality management and continuous quality improvement.

Competition and Competitor Information

Thai Union Group believes in vigorous yet fair competition and supports the development of appropriate competition laws. Thai Union Group and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

All information about Thai Union's competitors is obtained legitimately and will be used only for legitimate purposes in compliance with all relevant anti-trust and

other laws and regulations. No attempt is made at any time to divulge to Thai Union any information about Thai Union's competitors that is confidential to them and not available in the public domain.

Business Integrity

Thai Union Group does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Thai Union Group accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained. There is no actual or attempted participating in money laundering.

Conflicts of Interest

All Thai Union Group employees are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company.

All Thai Union Group employees must not seek gain for themselves or others through misuse of their positions.

Safeguarding Information and Property

Thai Union's confidential information, know-how, and intellectual property is respected and safeguarded. All

information provided by Thai Union is used only for its intended and designated purpose. All and any personal information about individuals such as Thai Union's consumers or employees is handled with full respect for the protection of their privacy and in compliance with all relevant privacy laws and regulations.

Compliance-Monitoring-Reporting

Compliance with these principles is an essential element in our business success. Thai Union Group Board and all supervisors are responsible for ensuring these principles are applied throughout Thai Union Group.

Any breaches of the Code must be reported in accordance with the procedure.

Thai Union Group Board expects employees to bring to their attention, or to that of senior management, any breach or suspected breach of these principles.