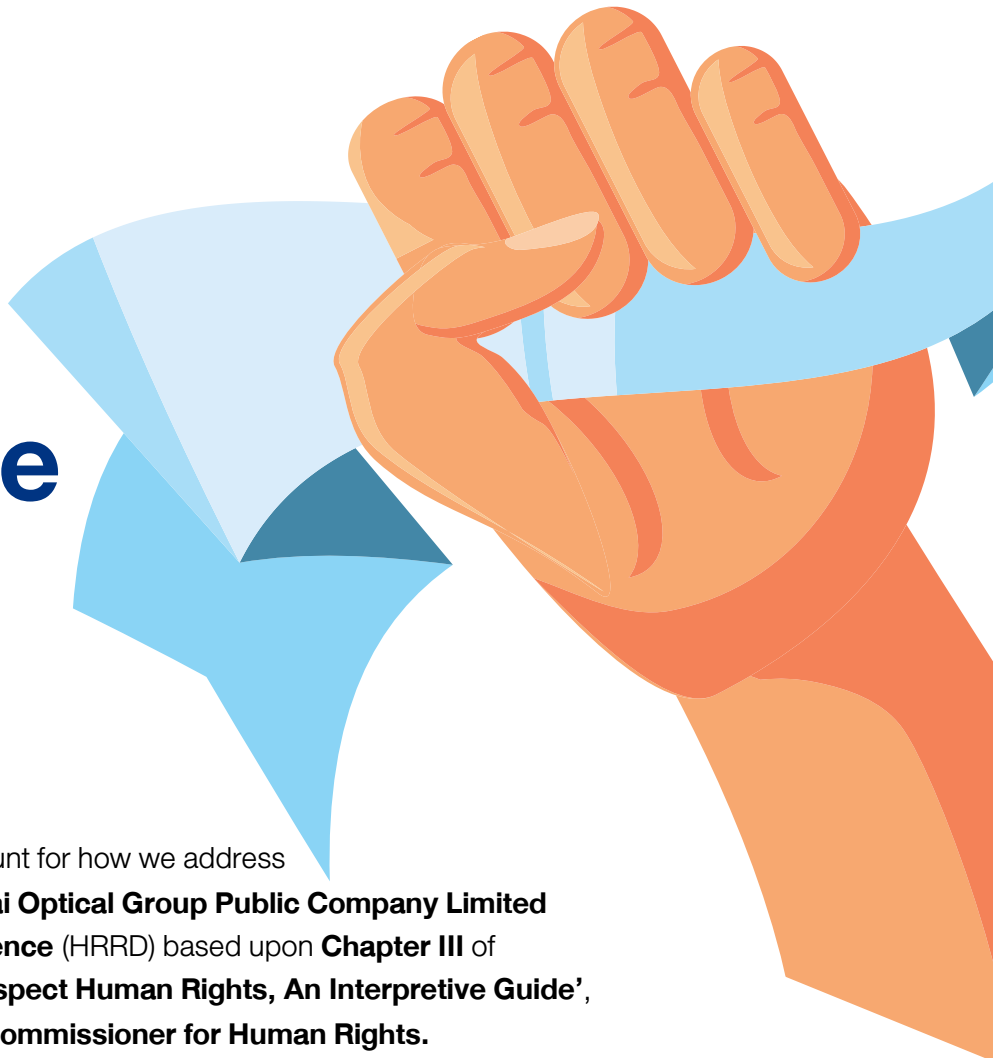


# Human Rights Due Diligence

# TOG Human Rights Due Diligence

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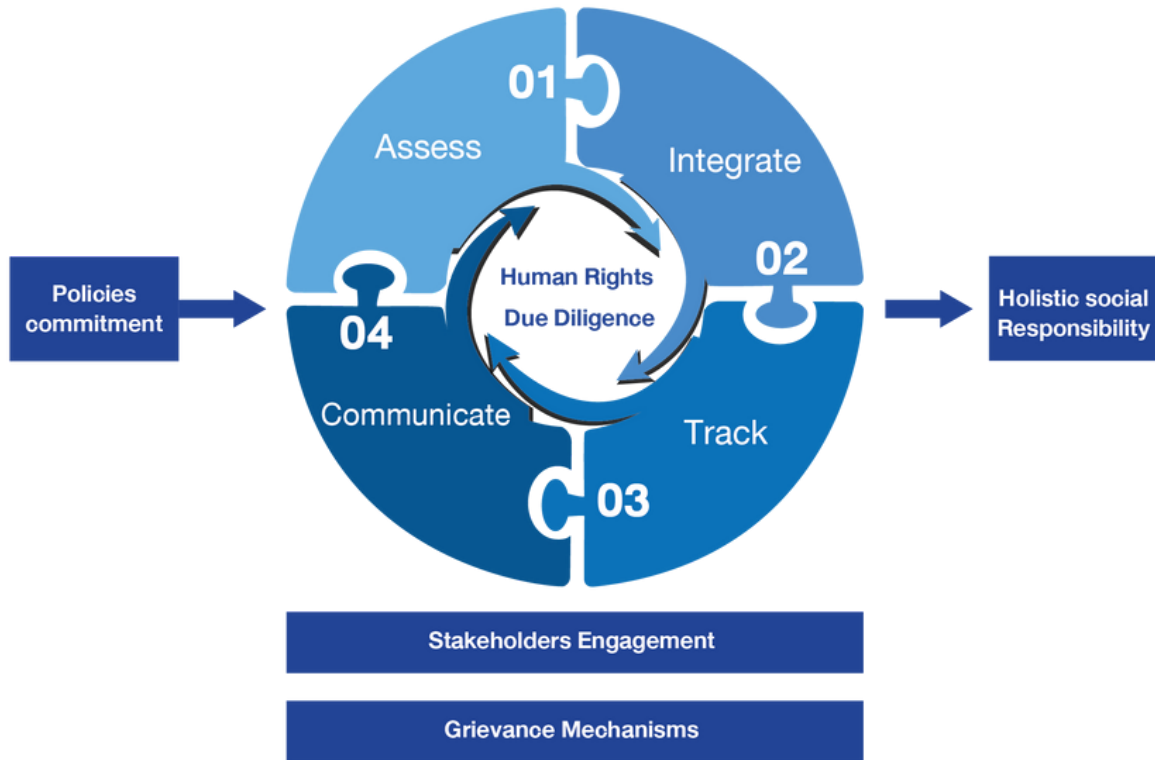


To identify, prevent, mitigate and account for how we address any adverse human rights impacts, **Thai Optical Group Public Company Limited** implements **Human Rights Due Diligence (HRRD)** based upon **Chapter III** of **'The Corporate Responsibility to Respect Human Rights, An Interpretive Guide'**, developed by the **Office of the High Commissioner for Human Rights**.

## TOG Commitment to Human Rights Due Diligence

1. We annually review corporate policies, relevant to human rights impacts, and the TOG Human Rights Policy, to ensure they remain updated, in accordance with any changes, which may be required by international norms or societal expectations, based upon relevant authority guidelines.
2. On conducting stakeholder engagement, we applied the **ISO 26000 Seven Principles of Social Responsibility**, as well as reviewed input and feedback from social audit external surveillance, concerning human rights, for continuous improvement.
3. We apply the **ISO 26000 Seven Core Subjects**, as a guideline, to train and educate relevant process owners in our organization and relevant supply chain touchpoints, to raise awareness, in order to be able to quickly identify any potential adverse human rights impacts, to prioritize the list of risk profiles, and to holistically integrate guidelines into relevant work procedures, to close any gaps.
4. Our **Human Resource Department** works with all relevant functions, including environment and procurement functions, on due diligence processes, which cover assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking our practices, and communicating corporate policies within TOG & Tier1 Suppliers.

## TOG Human Rights Due Diligence



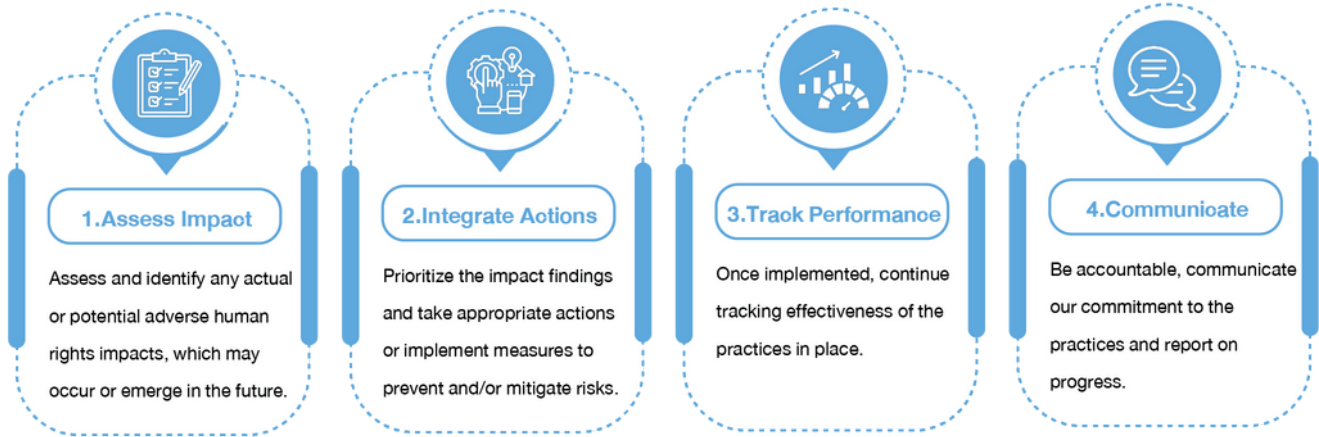
## TOG Human Rights Policy Statement

Thai Optical Group Public Company Limited and its subsidiaries are committed to **responsible business conduct and the respect for human rights** to avoid causing harm to people, as essential components of corporate governance, in accordance with the **UN Guiding Principles on Business and Human Rights**. Respect for human rights is embedded throughout the organization and is also promoted to our business partners, as follows:

- 1) Respect fundamental human and labor rights, and conduct duties without discrimination.
- 2) Implement ongoing risk assessments throughout the value chain, to identify, prevent or mitigate the impact of any violations to human rights, labor rights, consumer rights, and reduce impact on surrounding communities and the environment.
- 3) Facilitate a physically and psychosocially safe working environment, with zero tolerance to all forms of violence.
- 4) Prevent any use of forced labor or child labor within the organizations and supply chains. Support subcontractors, and service providers with training programs and regular assessments, to ensure widespread compliance.
- 5) Be open to equal opportunities in the workplace.
- 6) Organize secure channels for employees and stakeholders to open confidential dialogue on any matters of concern, and ensure transparency for long-term cooperation with all stakeholders.
- 7) Ensure everyone is aware of their duty to behave responsibly and to respect other people's rights.
- 8) Ensure confidentiality and privacy of personal data for all employees, stakeholders, and consumers.
- 9) Communicate the need and encourage employees and business partners in the supply chain to collectively and actively support the Human Rights Policy.



## Four Steps of the Human Rights Due Diligence Process



### 1. Assess Impact

In 2021, to update the Thai Labor Standard TLS8001 to the 2020-version, we assessed the potential adverse human rights impacts directly linked to, contributing to, or caused by our business activities, or by those we have relationships with. For transparency, the assessment was conducted with the support and surveillance of external auditors.

Since then, we have continued working on risk prevention and mitigation, relevant to human rights, which also include environment and product safety, procurement procedures and anti-corruption.

Since external circumstances, concerning human rights impacts, are continually evolving over time, in addition to our ongoing efforts, we are conducting further **Human Rights Due Diligence**, to ensure that the prioritized list of human rights risk profiles are annually reviewed with our senior management, with Board oversight, to facilitate appropriate budgetary resources, and continuously work with a holistic approach, based upon the social responsibility guidance provided by ISO 26000.

## Human Rights Due Diligence Assessment Scope

<b>Business Activities</b>	Spectacle lens manufacturing. International trade. Lens distribution.
<b>Operational Sites</b>	Manufacturing sites in Thailand.
<b>Specific Issues</b>	Occupational Safety & Health (OSH), Good Labor Practices, Management of Waste Disposal and Water Treatment, Personal Data Protection
<b>Vulnerable Groups</b>	Tier1 Supplier Workers. Female Workers. Pregnant Workers. Breastfeeding Workers.
<b>Specific Time</b>	During COVID-19 outbreak and after COVID-19 classification as endemic.
<b>Our Products &amp; Service</b>	Consumer safety, when using our spectacle lenses.



## Stakeholders Identification

We identify **relevant stakeholders**, using the following criteria:

- Those we have legal obligations to.
- Those who can significantly affect our business activities.
- Those likely to express concerns about our corporate decisions and activities.
- Those affected by our ability to fulfill our responsibilities.
- Those affected by the value chain.

## Stakeholder Engagement

In addition to external auditor advice, we apply the **ISO26000 Seven Principles of Social Responsibility**, to conduct meaningful dialogue, via meetings with relevant stakeholders, to better understand the perspective of potentially affected groups.

### ISO 26000 Seven Principles of Social Responsibility

### Train & educate relevant process owners ISO 26000 Seven Core Subjects of Social Responsibility

- 01 - Accountability
- 02 - Transparency
- 03 - Ethical behavior
- 04 - Respect for stakeholder interests
- 05 - Respect for the rule of law
- 06 - Respect for international norms of behavior
- 07 - Respect for human rights

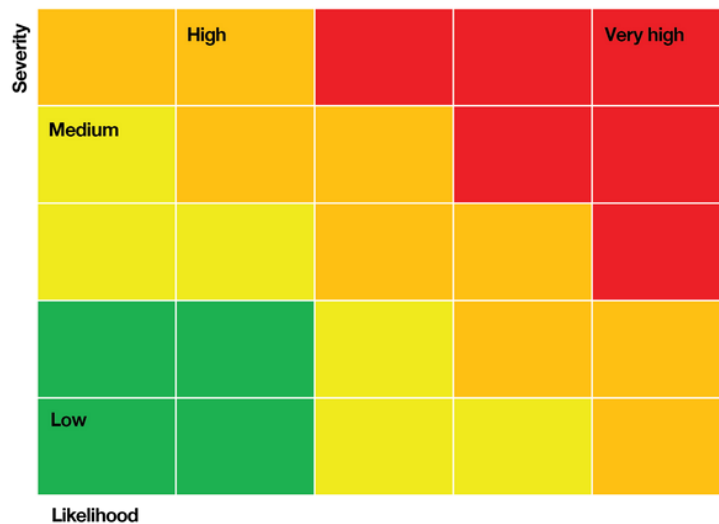
- 01 - Organizational governance
- 02 - Human Rights
- 03 - Labor Practices
- 04 - The Environment
- 05 - Fair Operating Practices
- 06 - Consumer Issues
- 07 - Community Involvement and Development

## Human Rights Impact Matrix

To determine the relevance and significance of the Human Rights Impacts, we examine the following criteria:

**Severity** - Extent of potential human rights violations. Societal expectations of responsible behavior related to Human Rights. Extent to which stakeholders are adversely affected. Level of stakeholders concern about issues related to Human Rights.

**Likelihood** - Probability of occurrence in day-to-day activities, or potential to arise under specific circumstances.



## 2. Integrate Actions

The **Human Resource Team** periodically reviews input findings, to identify and develop a **prioritized list of human rights risk profiles**, concerning actual or potential adverse impacts on human rights. Required actions and control measures are assigned to each relevant process owner, to ensure that they are authorized to and overseen by the right function and level within our organization, as well as receiving the necessary support and budgetary resources.

Saliency of Impact	Relevant Stakeholders	Material Topics	Prioritized list/ Area of focus	Control Measures
Very high	Workers & Tier1 Supplier Workers	Health & Safety	Reduce work-related injuries.	Train all workers to work safely. Promote healthy and safe workplaces. Develop work procedures to promote best practices of Occupational Safety & Health and administrate under the management system. OSH&E Committee controls and monitors OSH performance with the Safety Officers ,on a monthly basis.
Very high	Workers & Tier1 Supplier Workers	Health & Safety	Prevent group infection, after COVID-19 classification as endemic.	Continue COVID-Free Setting Protocols. Promote hygiene in the workplace.
Very high	Workers & Tier1 Supplier Workers	Health & Safety	Ensure access to necessary medical treatment and vaccination, during COVID-19 outbreaks.	Appointed a dedicated Working Team for actions. Followed the Universal Preventive COVID Safety Protocols. Promoted hygiene in the workplace.
High	Local community	Community Relationship	Prevent adverse environmental impact on the surrounding community.	Assess any environmental impact risks and ensure ongoing environmental management performance and monitoring.
Medium	All Employees	Personal Data Protection	Prevent unauthorized access to Employee Personal Data.	Follow implemented Security Measures on Personal Data Protection, and the TOG Personal Data Protection Policy, to avoid personal data breaches, control access to personal data, and prevent the loss, misuse or incorrect alteration of any personal data. Collect, use, disclose, and strictly manage Personal Data, according to the principles outlined in the Personal Data Protection Acts, Thailand.
Medium	All Workers & Tier1 Supplier Workers	Labor Practices	Prevent excessive working hours.	Continue planning & monitoring worker shift-scheduling to support work-life balance, as appropriate.

Saliency of Impact	Relevant Stakeholders	Material Topics	Prioritized list/ Area of focus	Control Measures
Medium	Tier1 Supplier Workers	Tier1 Suppliers Social Responsibility Assessment	Tier1 Outsourced workers have legal employment and can access good labor practices & OSHE.	Train & educate Tier 1 Suppliers to provide workers with legal employment. Assess Tier1 Suppliers, to ensure social responsibility, and provide employment that meets legal requirements, and is voluntary, with no forced labor, and no child labor. Accommodate access to good labor practices & adequate conditions of occupational safety, health and environment, for workers of Tier 1 Suppliers.
Low	Female Workers & Tier1 Supplier Workers	Labor Practices	Prevent threat or abuse risk.	Established Hotline via LINE@TOGG4.1 for prompt notification and investigation. Developed procedures in place to protect whistleblowers.
Low	Pregnant Workers & Breastfeeding Workers	Labor Practices	Adjust working conditions to suit pregnant and breastfeeding workers.	Make reasonable adjustments to ensure suitably safe working conditions for pregnant workers. Provide breast milk expressing breaks for breastfeeding workers.

### 3. Track Performance

We regularly monitor performance of implemented measures, at the Management Review Meeting through relevant Quality Management Systems, to ensure the effectiveness of actions taken. Performance tracking and evaluation enables us to make necessary adjustments in prioritized salience of impact and in approach.

### 4. Communicate

We annually review and evaluate the monitoring and adjust processes, according to the outcome of reviews, and communicate changes via our annual reports, in the **56-1 One Report** and **Sustainability Report**, as well as **GRI Content Index**.



## Grievance Mechanism

We continue to work on the grievance mechanism, as recommended under **Clause 6.3.6 of ISO26000** to manage effectiveness in resolving grievances.

### ISO 26000 Effective Grievances & Remedy Mechanisms (Clause 6.3.6)



#### Legitimate

Be a clear, transparent and sufficiently independent governance structure.



#### Accessible

Easy to access without barriers; such as language, illiteracy, lack of awareness, distance, and fear of reprisal.



#### Predictable

Be a clear procedure. Have clarity of the time frame for each stage, and outcome, whether can or cannot be, with appropriate means of monitoring.



#### Equitable

Aggrieved parties can access sources of information, advice, and expertise, necessary to engage in a fair grievance process.



#### Rights-Compatible

The outcome and remedy align with recognized human rights standards.



#### Clear and Transparent

Respect individual privacy and reputation, and be appropriately published for the sake of public interest.



#### Based on dialogue and mediation

Seek mutually agreed solutions to grievances through engagement between the parties. Where adjudication is desired, parties should retain the right to seek this through separate, independent mechanisms.

Furthermore, we ensure the following whistleblowing channels are open for stakeholders, to raise concerns and complaints, and report violations or non-compliance with any code of conduct or ethics standards:

- Mobile application [LINE@TOGG4.1](mailto:LINE@TOGG4.1)
- Email: [hotline@thaiopticalgroup.com](mailto:hotline@thaiopticalgroup.com)
- By sealed letter to the **Internal Audit Office** or the **Audit Committee**, at
- Thai Optical Group Public Company Limited, No.15/5 Moo 6, Bangbuathong-Suphanburi Road, Laharn, Bangbuathong, Nonthaburi 11110, Thailand.

There are active procedures in place to investigate findings and provide whistleblower protection. Nevertheless, the grievance mechanism does not prejudice access to available legal investigations, when deems necessary.