

Sustainability Report

2022

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**Do your part in
saving the planet**



**Eco-friendly
ophthalmic lens**

**82% bio-based
content**

**More than 5x fewer
CO₂ emissions**





CEO's Message

“At TOG, we are continuing our mission to be a leading and sustainable manufacturer of quality, value spectacle lenses, supported by the hard work and efficiency of our people, from the ground up, guided by the clarity of our purpose and core values. Whilst working to protect the best interests of the many lives we touch, from our people, our stakeholders our partners and our surrounding communities, to all of those with vision correction needs to fulfill, we implement practical, sustainable solutions, everyday, for a better tomorrow, for society and for the environment.

In the last few years, we have increased our resilience to a rapidly changing global arena, and continually develop new ways to adapt and thrive, even in the most challenging circumstances. With emphasis on health and safety, data protection and privacy, cyber security, human rights, and education and training incentives, across the entire organization, we have bolstered partnerships with our suppliers, business associates and customers, and contribute towards long-term sustainability.

Our ongoing community outreach programs and initiatives allow us to give back and positively impact those around us, while we strive to be the preferred choice for better vision solutions, and a shining example of the possibility for better being and living, now and into the future.

We are fostering a collaborative culture of continual improvement. Leading by example, maximizing efficiency, synergizing business, delivering the best value on time every time, and providing uninterrupted responsive service excellence and support for our people, all in a sustainable manner, are just some of the guiding principles that inform each decision we make, every single day.

Our continued sustainability commitment to **‘CRAFT with CARE’** remains a key driver within our core values, amidst our sustainability efforts. Our successes would not be possible without the understanding and cooperation of all of our employees, suppliers and customers, and for this we extend our boundless gratitude.

Torn Prachartam
Chief Executive Officer

Driving Business for Sustainability

Our commitment to operating our business with responsibility towards a wide range of stakeholders is unwavering. We look both within and outwards, to be able to understand and respond to the increasing call, globally, for environmental and social responsibility. We also strive to enhance collaboration with the people in our organization, in our surrounding communities, and with international business partners and customers, and encourage them all to be part of a responsible, global enterprise. Thai Optical Group (TOG) supplies quality spectacle lenses across 50 countries, over 6 continents, and has a strong, proven track record, across a rich 60-year history.

Our current **sustainability mission statement** mandates that we **'Craft with Care'**, in alignment with our corporate mission and core values, to help achieve a better and more sustainable future for all. We have embedded our social, environmental and governance performance principles and practices into our day-to-day working procedures, across all manufacturing facilities and business operations, at TOG, and at our subsidiary, Thai Optical Company Limited, in Thailand. In 2022, we added one further aspect, to cover four key areas of our sustainability goals, as follows:





1. TOG Sustainability Mission Statement

At TOG, we ‘**Craft with Care**’, to help people around the world lead healthier and more fulfilling lives, through the power of sight. Healthier living is the foundation of sustainability for all, from our employees, business partners, customers and spectacle lens wearers, to our surrounding communities and the environment. The four tenets, at the heart of our ‘Craft with Care’ sustainability mission, are as follows:

1. Caring for the Environment:

Responsibly and efficiently utilize resources and dispose of waste properly. Engage across all work functions through ISO14001 environmental management system working procedures, to minimize the environmental impact of our business operations.

2. Caring for People :

Promote collaboration among employees and surrounding communities, building strong, lasting relationships, to demonstrate responsible practices.

3. Caring for Performance:

Strive for continual improvement in efficiency, in sustainability performance and in maintaining long-term business viability.

4. Caring for Partnership:

Collaborate with business partners, customers, and actively engage with all sectors to create positive change toward a sustainable future.

2. Prioritizing Support for UN SDGs

Our sustainability goals and activities support the following **UN Sustainable Development Goals (SDG)**:



SDG 3. Good Health & Well-Being: Ensure healthy lives and promote well-being for all, at all ages.

We help people around the world lead more fulfilling lives, through the power of sight, with a wide variety of quality spectacle lenses, to help those with a wide array of vision conditions see more clearly.



SDG 12. Responsible Consumption & Production: Ensure sustainable consumption and production patterns.

We are dedicated to utilizing resources responsibly and efficiently, collectively working across all levels and functions within the organization, to appropriately manage waste disposal and environmental systems.



SDG 13. Climate Action: Take urgent action to combat climate change and its impacts.

We adopted GHG Emissions reporting and have undertaken the necessary actions for mitigating GHG-emissions, in the long term. Since climate change causes adverse impact on atmospheric variability, in solar ultraviolet and visible radiation, we have taken a broader perspective, in tackling this issue. TOG collaborates globally with business partners, to strengthen resilience and bolster adaptability, in delivering a range of **climate-resilient products**, such as bio-polymer lenses, with a lower carbon footprint, and sun-glare filtered lenses, with UV-absorption, to protect eyes against the danger of overexposure to UV-radiation.



SDG 17. Partnerships for the Goals: Strengthen the means of implementation and revitalize the global partnership for sustainable development.

Compared to key global players, we are a small/medium-sized enterprise with limited budgetary and resource constraints, dealing in international trade. However, we display an unwavering commitment to meeting sustainability standards and to conforming to relevant international regulations, to benefit from the growing economic opportunities of global supply chains. Our sustainability commitment, ‘**Craft with Care**’, enhances our business customers’ performance to gain end-consumer confidence. **Customers, buying products from Thai Optical Group, contribute to increasing work opportunities locally, and help support a small local producer, who actively advocates for social and environmental responsibility, to participate in the complexities of global trade.**





3. Our Sustainability Mission Approach & Working Methodology

We treat our social and environmental impact as one of the corporate key performance indexes, at the organizational level, to measure the success of our business. We endeavor to prioritize it, wherever possible, to drive viable corporate profitability and to strategically align it, in the long term, within our business.

The Board appointed the **Chief Executive Officer**, with full **management accountability**, to ensure long-term sustainable development integration and performance. Responsibilities include decision-making, assessing and appropriately prioritizing key materiality issues, allocating necessary resources, implementing relevant principles and practices, monitoring social and environmental performance, regular management reviews, and track associated corporate communications, orientation and ongoing training.

In 2022, we structured a dedicated **Sustainability Department** with full-time, in-house managers, focused on integrating safety and environmental practices to positively impact our sustainability mission, in line with the optimum functioning of our manufacturing and business operations best practices. This dedicated function was explicitly created to ensure occupational safety and environmental performance.

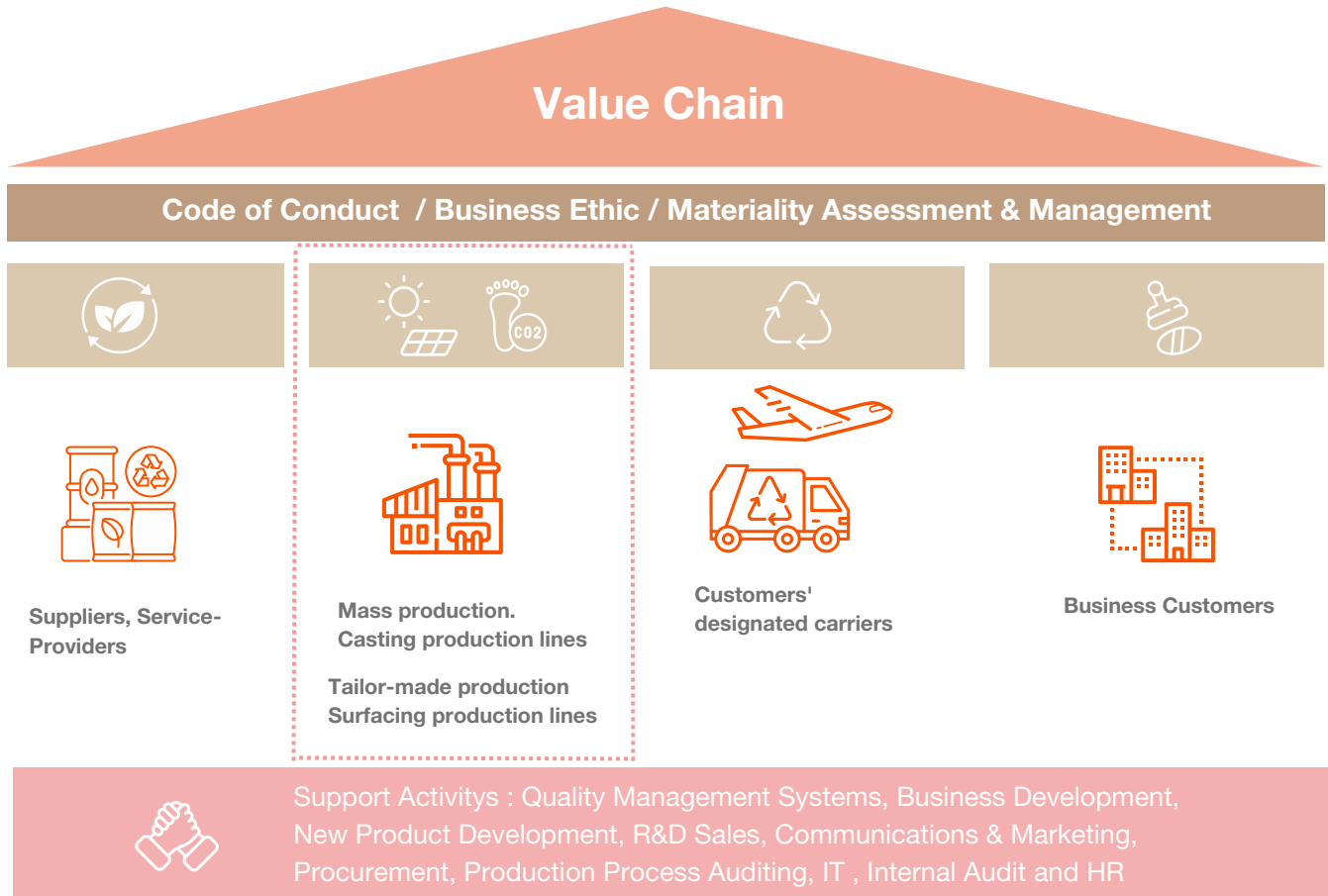
Our **Sustainability Working Team** sees the **Sustainability Department** working closely together with all **relevant functions**: Quality Management Systems, Business Development, New Product Development, R&D, Sales, Communications & Marketing, Procurement, Production Process Auditing, IT, Internal Auditor and HR, to drive all necessary actions, and foster supply chain cooperation, amongst all employees, outsourced workers, suppliers, service providers, business customers, and the surrounding community.

4. Sustainability Performance Progress Tracking & Reporting

To effectively communicate our sustainability values and performance, we map out and align activities with the Stock Exchange of Thailand (SET)'s environmental, social and governance reporting framework in Thai Version (**SET ESG Metrics**), to standardize our voluntary annual reporting of ESG data, in addition to the non-mandatory reporting framework of the Global Reporting Initiative, 'GRI Content Index', which we also report on yearly. The index lists can be viewed at the end of the Sustainability Report in English Version.

5. Our Business Value Chain

The core activities carried out by our organization, which include product design, manufacturing, sales, delivery and business support, continuously create value for our stakeholders. **The primary activity is manufacturing** for both lens casting production at Thai Optical Group Public Company Limited (TOG) and patient-matched prescription lens surfacing production at the subsidiary, Thai Optical Company Limited (TOC), both located in Thailand. **Support functions include HR, Procurement and Marketing & Sales**, for both TOG and TOC, integrated under the same organization structure.



6. Stakeholder Engagement

Below are the methods we use to elicit feedback from relevant stakeholders, regarding our social and environmental performance on material issues.

Stakeholders	Context	Methods of Communication/Relationship Interaction/Information Collection
Workers	Employees and ‘Tier1’ suppliers carrying out work for TOG and TOC, include outsourced workers, cleaning teams and security guards, performing duties at our manufacturing facilities	Employee relations activities. In-person meetings and group meetings. LINE@TOG. Surveys. Orientation. Training. Hotline Mailbox. Town-hall meetings.
Customers	Business customers, importers, distributors, surfacing labs, who source our products and services, for their intended use, whether purchase to sell, distribution as is, purchase for own consumption, or use in fabrication, such as grinding, surfacing, cutting & mounting into frames, and reselling to their end-consumers	Business meetings via digital platforms, management review meetings and Customer Satisfaction Survey.
Local Community	Surrounding communities living adjacent to TOG, at the 6th-Village, and TOC, at the 5th-Village, in Laharn Sub-District, Bangbuathong, Nonthaburi	Individual or group meetings. Surveys with stakeholders or stakeholder representatives. Focus groups.
Shareholders	TOG Shareholders	Investor relations (IR) activities, including IR Contact. Annual General Shareholder Meetings.
Regulators	Relevant governmental regulators and international industrial standards organizations	News subscriptions. Online meetings. Training seminars. Assessment programs. Governmental activities & network participation. Relevant international association memberships.

7. Management of Material Issues

We evaluate, identify, assess, and prioritize the most relevant material social and environmental issues, aligned with our operations and business practices, guided by the following four steps.

The 4-Steps from ‘Value Chain’ to ‘Material Topics’

1) Evaluate Value Chain & Business Context

Every year, we evaluate our value chain, strategic goals, any new or changing business contexts, and consider all relevant topics in the consumer products industry sector. We remain updated on medical device regulations and all relevant rules and regulations.

2) Engage Stakeholders & Identify Material Topics

We identify material topics, based upon the prioritized actions considered to best serve our business objectives and positively impact the stakeholders. In parallel, we engage with stakeholders, as outlined above, to understand each group’s priorities.

3) Assess Impact on Business Objectives & Stakeholders

We conduct a Company materiality assessment, by incorporating identified material topics and feedback from the stakeholders, to ascertain ongoing and potential impacts. The assessment matrix rates factors according to ‘increasing importance to business success’ and ‘increasing importance to stakeholders’.

4) Prioritize Material Topics & Report Performance

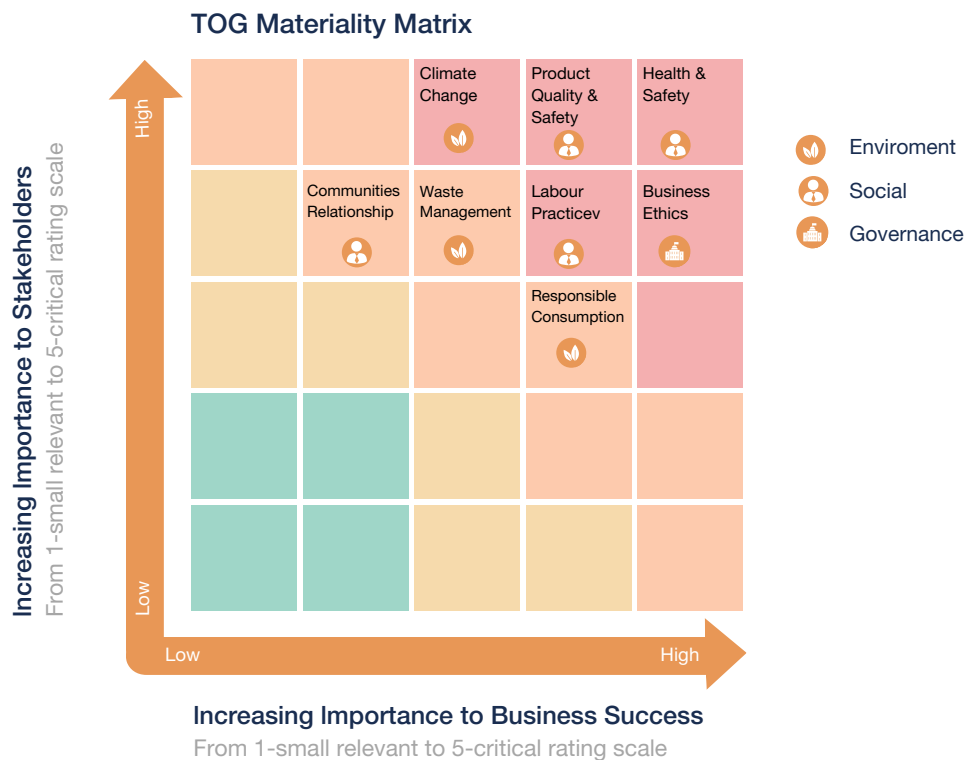
Based on our survey and review process, we prioritize the most significant impacts from the **Materiality Assessment Matrix** and report findings to the Board for oversight and recommendation, to ensure they are fully aligned with, relevant to and supportive of our overall business strategies.

Although the Company conducts a materiality assessment update every year, we may adjust and/or update certain material issues more frequently, as necessary.



Materiality Assessment Matrix

We implement well-rounded processes, consolidating various inputs from internal and external stakeholders, to determine **'Interest/Demand'** and **'Influence/Impact'**, pertinent to each group of stakeholders, and to prioritize criteria, in terms of **importance to stakeholders and business success**. Below is the materiality assessment matrix, including the list of material topics and how we managed them, in 2022:



Society & People				
Priority	Stakeholders	Material Topics	Issues/Expectations	Materiality Management
Very high	Workers	Health & Safety	COVID-19 infection became sporadic in employee households. Continue to reduce work-related injury incidents.	Continue COVID-Free Safety Protocols, and Control & Prevention Measures. Support employee access to vaccine boosters. Promote hygiene in the workplace. Train workers on workplace safety.
Very high	Workers	Good Labor Practices	Adhere to applicable practices to promote healthy and safe workplaces and respect human rights.	Comply with Thai Labor Standards TLS8001-2020 . Support the Human Rights Policy. Ensure no modern slavery, forced labor, human trafficking or child labor. Manage relationships and increase employee engagement.
High	Local Community	Community Relationships	Prevent adverse environmental impact on the surrounding community.	Assess any environmental impact risks and ensure ongoing environment management monitoring.
Very high	Customers	Product Quality & Safety	Provide regular updates on any changes in relevant technical and industrial information or new product safety requirements.	Comply with applicable quality management systems, medical device management systems, related international industry standards and/or product safety requirement.

Environment				
Priority	Stakeholders	Material Topics	Issues/Expectations	Materiality Management
High	Regulators	Waste Management	Environmental compliance.	Manage suitable waste disposal processes, to prevent negative impact from business operations.
High	Regulators	Responsible Consumption	Efficient energy and water consumption within the organization.	Utilize resources responsibly and efficiently to support planetary health. Study the implementation of renewable energy Solar PV Rooftop
Very high	Regulators	Climate Change	Follow through on initiated actions and nurture partnerships to reduce carbon emissions.	Comply with applicable quality management systems, medical device management systems, related international industry standards and/or product safety requirement.
Governance				
Priority	Stakeholders	Material Topics	Issues/Expectations	Materiality Management
Very high	Shareholders	Corporate Governance	Ensure TOG, wherever located, meets the relevant guiding principles and is committed to delivering high standards in social, environmental and good corporate governance.	Conduct business with good corporate governance and in compliance with all legal requirements. Promote good ethics in conducting business, together with business partners. Manage risk across all business processes and operations.



8. Environmental Sustainability

TOG is acutely aware of its responsibility to society and the environment, and is committed to a worthwhile, effective and efficient use of resources. The Company takes a proactive stance on its commitment to mitigating any adverse environmental impact from business activities, and offers eco-conscious products, to support planetary health. TOG has already actively embedded the following environmental policy into standard daily working procedures:

TOG Environmental Policy

TOG is committed to producing quality spectacle lens products, which are environmentally responsible, and thus has universally implemented the environment management system ISO14001. All employees and business partners are urged to actively adhere to the following policy:

1. Strictly comply with the laws, rules, regulations and all environmental obligations, related to TOG business operations.
2. Commit to the most efficient use of resources, to better protect the environment in sustainable ways.
3. Assess the risks of, control, prevent and reduce environmental impact, resulting from TOG's activities, to eliminate, as far as possible, any impact on the environment and surrounding communities.
4. Promote and develop products, technologies and/or production processes, to be more environmentally friendly, to have less impact toward climate change and in line with the lifecycle perspective.
5. Encourage continuous improvement in environmental performance, linked to the sustainability targets.
6. Promote employee awareness and active participation in environmental responsibility.

Environmental Management System (EMS) – Additional Voluntary ISO14000 Compliance

TOG's **Environment Officer** undertakes mandatory accountability for environmental actions, involving monitoring, compliance and enforcement, in line with governmental regulations. This dedicated position works to professionally evaluate environmental management, and to ensure all conditions meet the required regulations, to mitigate risks, which may arise from business operations, as well as to keep up-to-date on new regulatory requirements and relevant future trends.

TOG voluntarily implemented the **ISO14001:2004 Environmental Management System**, with a Steering Committee, comprising members from all relevant functions across the companies, working together on waste generation, energy usage, water usage and carbon emissions. The EMS assesses environmental impact from our manufacturing activities and stipulates actions to avoid, prevent or mitigate any potential negative impact. The **Sustainability Department** sets quantifiable targets for environmental aspects of our manufacturing operations, with allocated resources, to achieve those targets. Our monthly Sustainability Meeting reviews and reports on environmental matters to the management, in addition to periodic compliance reviews, by third-party external auditors, to consistently renew EMS certification.

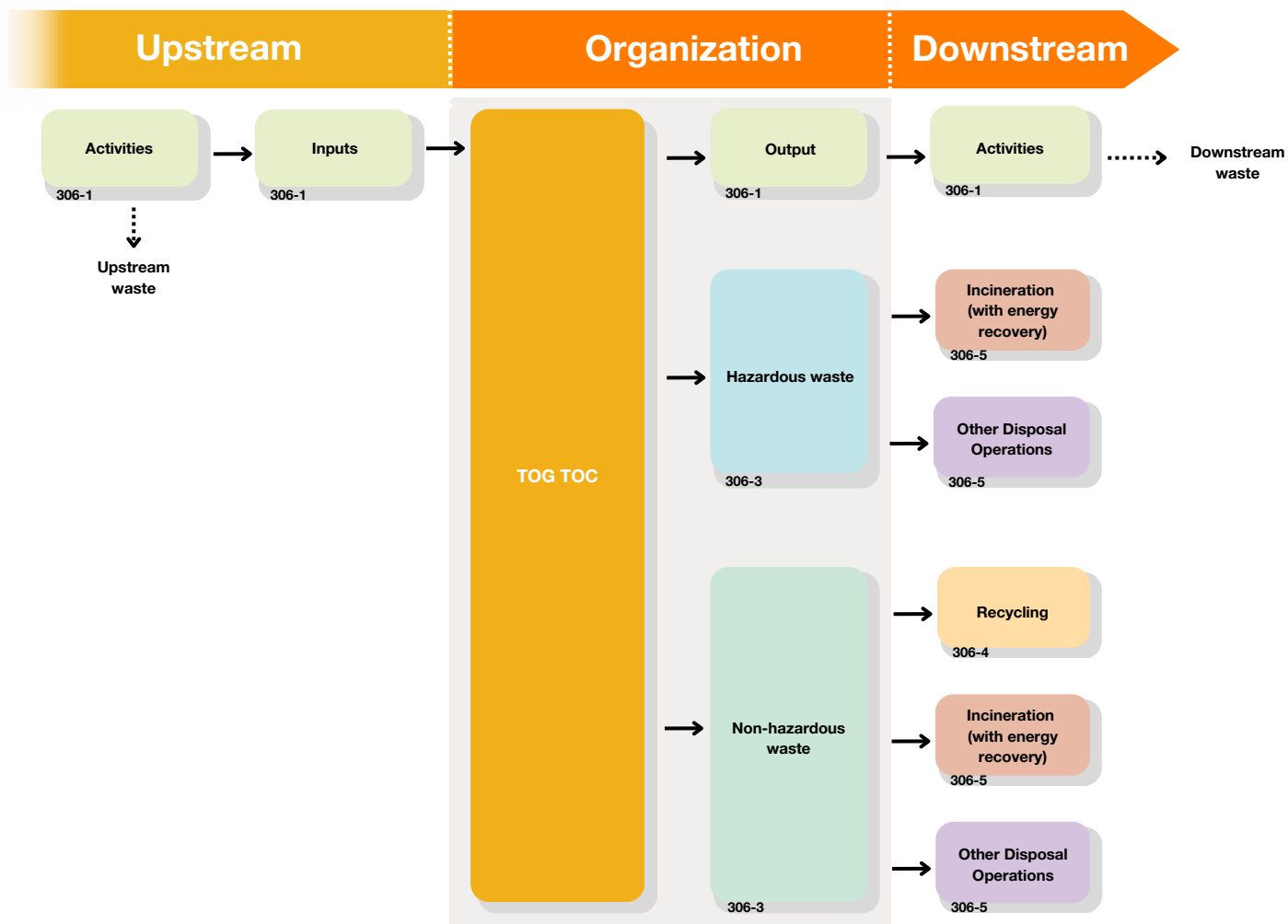
Furthermore, **TOG has been certified Green Industry Level 3 (Green System)**, as the first company in Thailand, to study greenhouse gas emissions from plastic lens production, and to be registered for the carbon footprint certificate for 1.50 plastic lenses with the **Thailand Greenhouse Gas Management Organization**.





Zero Landfill of Production Waste

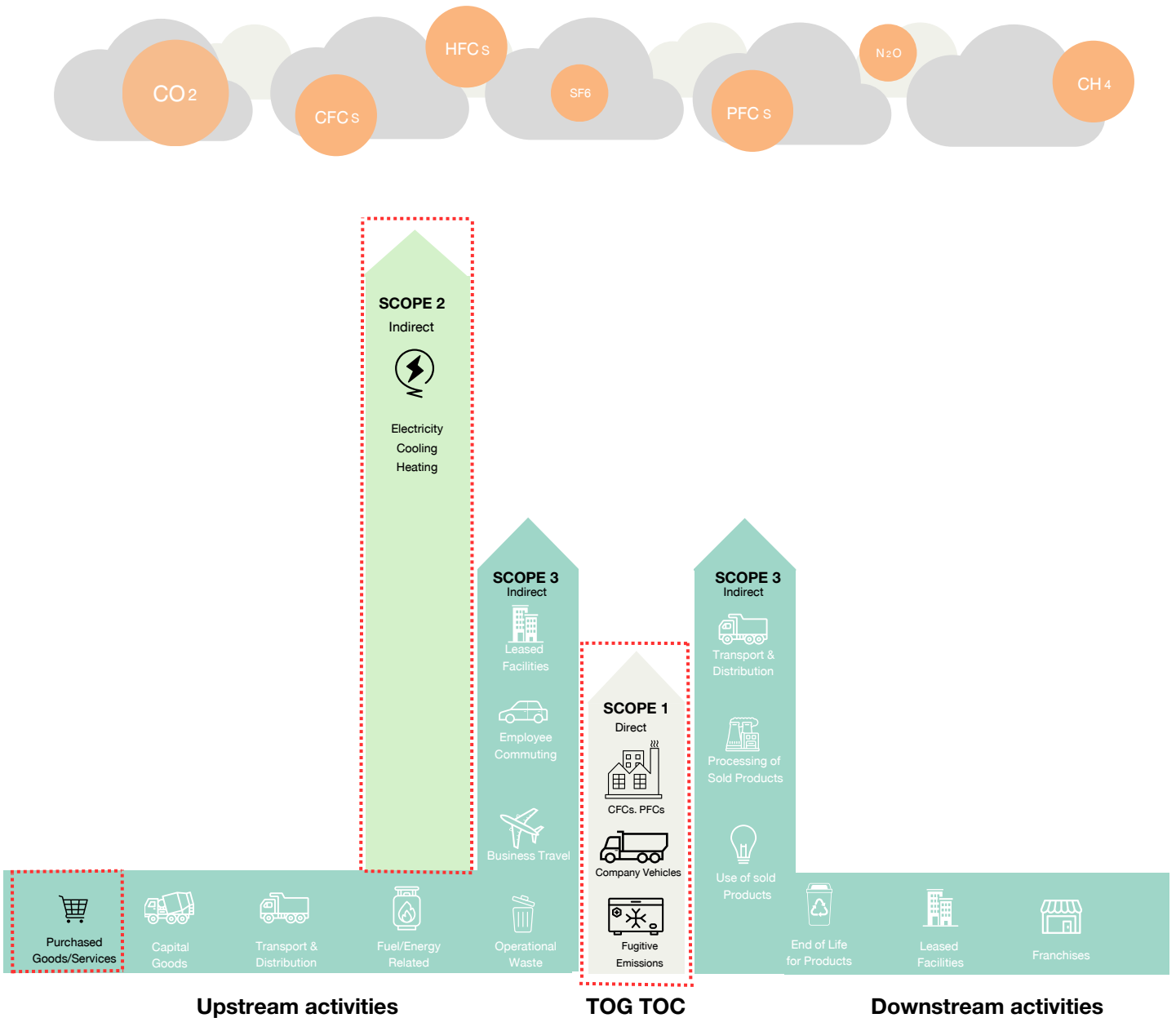
Outgoing waste from production and incoming packaging materials are appropriately disposed of, by way of various technical methods to eliminate landfill deposits. We endeavor to eliminate waste production from manufacturing as far as possible, but there are still a few unavoidable outputs. One example of how we appropriately dispose of production waste is the recycling of scrap Standard Lenses into fine granulated plastic, which is an abrasive blast media, widely used in other various types of industrial surfacing work, in preparation or finishing applications, such as cleaning, deburring, and rust removal.



Carbon Footprint Assessment & Reporting

TOG consolidates greenhouse gas (GHG) emissions from the following two controlled operations in Thailand, and is third-party accredited, by the Thailand Greenhouse Gas Management Organization (TGO). The carbon footprint assessment scope, in both facilities, is ‘Cradle-to-Gate’ (B2B model). The GHG emissions calculation is made in accordance with ISO 14064-1. We report the **consolidated result of GHG emissions (Scope 1, 2 & 3) each year**, in our **GRI-Referenced Context Index** within the **Sustainability Report**, according to TGO Guidance of the Carbon Footprint for Organizations.

Organization level	Controlled Operations	GHG Emissions Report Scope	Type of Carbon Footprint Assessment
TOG	Mass production. Casting production lines.	<p>Scope 1 Direct GHG Emissions: Fuel for TOG vehicles, diesel generators, and refrigerants.</p> <p>Scope 2 Indirect GHG Emissions: Purchased or acquired electricity, heating and cooling, etc.</p> <p>Scope 3 Other Indirect GHG Emissions: Purchased goods and services.</p>	Only a portion of casting production. The assessment is validated and certified by a third-party, accredited by the TGO.
TOC	Tailor-made production. Surfacing production lines.	<p>Scope 1 Direct GHG Emissions: Fuel for TOC vehicles, diesel generators and refrigerants.</p> <p>Scope 2 Indirect GHG Emissions: Purchased or acquired electricity, heating and cooling, etc.</p> <p>Scope 3 Other Indirect GHG Emissions: Purchased goods and services.</p>	Only a portion of surfacing production. The assessment is validated and certified by a third-party, accredited by the TGO.



Carbon Footprint of Organization (CFO) & GHG Emissions Reduction Target

Based on GHG emissions reports **at the organizational level** so far, we are developing a specific strategy, to reduce the impact of the **Scope 2 Indirect GHG Emissions** from **electricity consumption**. This appears to have the most significant impact from our organization in Thailand. At the same time, we are analyzing the previous years' data, together with the upcoming year, to determine '**Base Year GHG Emissions**', to use as a reference for comparison and track the reduction percentage of Scope 1 and 2 GHG emissions, through efficiency improvement activities, year on year.



Energy Consumption & Renewable Energy Project

We have been recording and monitoring energy consumption in both manufacturing operations for the past few years and have conducted a feasibility study for investment in Solar Photovoltaics - either by self-financed or third-party ownership models. **In 2022, the Board approved the renewable energy investment project, for the implementation of a Solar Photovoltaic Rooftop, via a self-financed model. The plan system size is about 1.9 Megawatts-capacity, which is equivalent to a reduction of GHG emission of about 1,192.8 tonsCO₂e, or around 6,311 trees-plantation** The project kicked off with a site evaluation, and engineering & construction contractor evaluation, and is expected to enter the construction and installation phase, in the middle of the following year.



Carbon Footprint of Products (CFP)

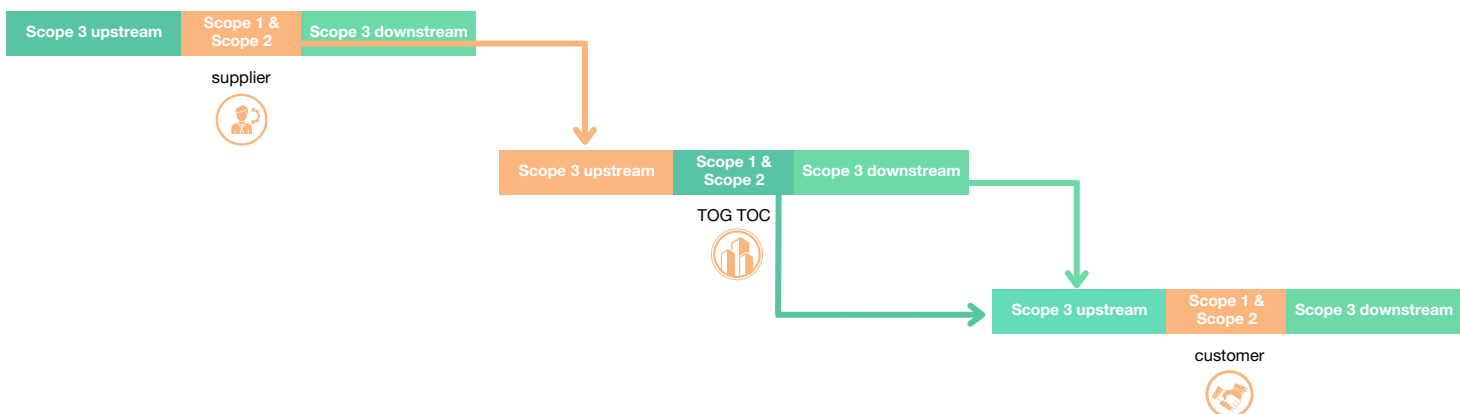
Our product assessment is ‘**Cradle-to-Gate**’ (B2B model). We only quantify the carbon footprint of spectacle lens manufacturing, since full lifecycle assessment is impossible. The impact of product usage and the end-consumer behavior, related to product end-of-life, are beyond our control. Therefore, we cannot label our spectacle lens products with the CFP marking. Our business customers buy our lens product and complete the necessary fabrication for finished spectacles (finished goods), before supplying them to the end-consumers.

Supporting Business Customers on Climate Action

Any business customer, who wishes to conduct a carbon footprint assessment, in any specific controlled operation of our product manufacturing, or a formal full lifecycle assessment, ‘**Cradle-to-Grave**’ (B2C model), is able to pass any technical questions to their regular point of contact. Our Sustainability Department provides support and relevant information on the applicable loop of the supply chain, to allow the customer to calculate the carbon footprint.

We endeavor to collaborate with our business customers on collecting and reporting data, and keeping track of our GHG emissions reduction performance. **Upstream GHG emission reduction from manufacturing contributes to our customers’ downstream emission performance improvements.**

GHG interlink



USDA Environmentally Certified ‘TOG LeafEco Lenses’

Traditionally, polymer spectacle lenses, made with thermosetting plastic, were not decomposable, since decomposable materials are not able to display sufficient light refraction qualities suitable for spectacle lenses. In 2014, TOG began working on a sustainability initiative, with the chemical raw material supplier, Mitsui Chemical, integrating environmental considerations, in order to manufacture a bio-polymer lens. The resulting ‘**TOG LeafEco Lenses**’ are made from a bio-based component, derived from palm oil, with a reduced carbon footprint. The palm oil was sourced from a sustainable plantation, with no deforestation concerns, and is certified as a Roundtable Sustainable Biomaterials (RSB) by SCS Global Services Notified Body.

The **USDA has certified TOG LeafEco Lenses on the Bio-Preferred Program** with a test result of 82% bio-based content.

In 2022, the USDA, having considered the importance of this certification, created a new ‘**EYEWEAR**’ category in their ‘**Personal Care and Toiletries**’ listing of products that satisfy the minimum bio-based content requirement, adding TOG LeafEco Lenses to this list.

TOG LeafEco provides consumers with an alternative lens choice at a lower carbon footprint. The sales of this eco-friendly product have seen continuous growth, year-on-year.

The infographic features a central green background with the TOG logo and the text 'LEAFECO live eco. see eco'. On the left, a vertical dashed-line border contains several circular icons: a palm tree (RSB), a leaf (USDA Bio-Preferred), a CO2 footprint (326 g CO2e), a globe (82% bio-based), and a person (USDA EYEWEAR). On the right, two dashed-line boxes contain Thai text and icons. The top box, labeled 'live eco', describes the RSB certification and carbon footprint. The bottom box, labeled 'see eco', describes the USDA EYEWEAR certification.

live eco

การมีฉลากใบไม้สีเขียวของกองทุน
สามารถช่วยปกป้องโลก จากภาวะโลกร
ร้อนได้ ซึ่งฉลากนี้ ‘LeafEco’ มีส่วนในการ
ช่วยลดปริมาณการปล่อย CO₂ อยู่ใน
บรรยากาศโลกได้ถึง 326 กิโลกรัม ต่อ
กระบวนการผลิตเลนส์ 100 กิโลกรัม

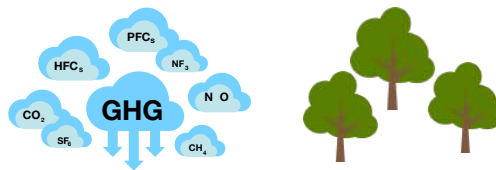
see eco

การมองเห็นโลกใบนี้อย่างชัดเจนนั้น
เป็นสิ่งสำคัญสำหรับคุณ แต่การรักษา
สิ่งแวดล้อมให้โลกใบนี้ ก็เป็นเรื่องสำคัญ
สำหรับทุกคนเช่นกัน ซึ่ง LeafEco จะ
ทำให้การมองเห็นผ่านเลนส์ของคุณนั้น
แตกต่างออกไป

Partnership with the SET Social Impact

TOG is actively participating in the Social Impact activities of the Stock Exchange of Thailand, using the Climate Care Platform, via the 'Care the Bear' and 'Care the Whale' projects, to collectively quantify GHG emission equivalents, by tracking various climate action activities in the Company.

The total amount of greenhouse gases reduced and the equivalent of planting trees.



Care the Bear

Campaigned through various activities and online communication promoting employees to contribute the GHG reduction in 2022.



Reduced greenhouse gases
5,028.23 kg.CO2e



Equivalent to planting
559 trees.



Care the Whale

Joined the "Invisible Waste" project, by "reduce, reuse, and recycle" general garbage in 2022.



Amount of waste handled
283,758.00 kg



Reduced greenhouse gases
1,566,891.73 kg.CO2e



Equivalent to planting
174,099 trees.



Environmental Metric Indicators

TOG has selected relevant parts of the **GRI Standards**, as universal reference indicators for monitoring and tracking standard environmental impact data. The results are reported under the **GRI Context Index**, on a yearly basis, and are disclosed on the index table at the end of the Sustainability Report. The most recently available versions of the GRI Standards are kept up-to-date. The data boundaries to year-end are collected from TOG business operations in Thailand.

9. Social Sustainability

TOG corporate culture and social practices, within business activities and relationships, are based upon the principles of valuing, supporting and respecting all stakeholders, business partners and customers. We strive, through internal review mechanisms, to mediate and resolve any and all grievances, with fairness and to mutual benefit.

TOG Human Rights Policy

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 rights, and conduct duties without discrimination.
- 2) Implement ongoing risk assessments throughout the value chain, to identify, prevent and/or mitigate the impact of any violations to human rights.
- 3) Facilitate a physically and psychosocially safe working environment, with zero tolerance to all forms of violence.
- 4) Be open to equal opportunities in the workplace.
- 5) 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.
- 6) Ensure everyone is aware of their duty to behave responsibly and to respect other people's rights.
- 7) Ensure confidentiality and privacy of personal data for all employees and stakeholders.
- 8) Communicate the need and encourage employees and business partners, to collectively and actively support the Human Rights Policy.

HR monthly meetings incorporate a regular review and reporting component, shared with the management, related to whistleblowing, relevant investigations, stakeholder grievances and any human rights violation allegations, if available.



The Labor Standard & Employment Management

To ensure good labor relations and employment management practices, TOG consistently renews certification of the TLS-8001:2020 Thai Labor Standard Complete Level, by the Department of Labor Protection and Welfare, Ministry of Labor, Thailand. The Labor Standard collectively covers good governance of welfare, employment, work environment, occupational health and safety management, for employees and all workers within TOG facilities. The key changes under the 2020 version include not only implementing international guidelines, as per the International Labor Organization (ILO), and ensuring anti-modern-slavery compliance, but also require that the execution of good labor practices and social responsibility are proactively organized and monitored under the management system for continuous improvement and long-term sustainability.



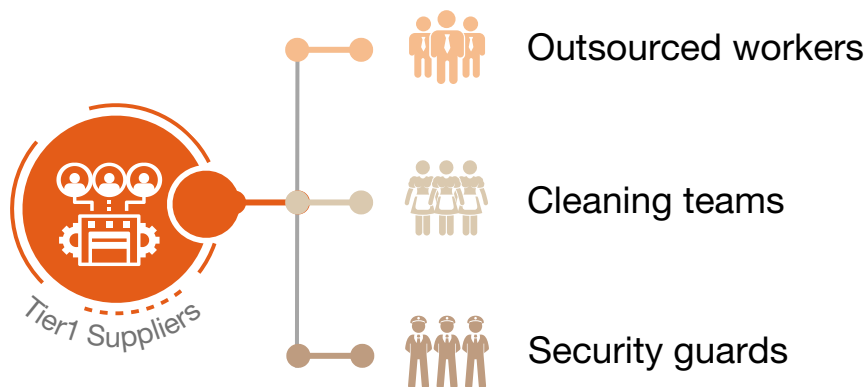


Tier1 Suppliers Social Responsibilities Training & Assessment

Regarding relevant stakeholder engagement, 'Workers' defined as Tier1 Suppliers are outsourced workers, cleaning teams and security guards, working within TOG/TOC facilities. Five suppliers were identified as having significant actual and potential negative social impacts. Training sessions and assessments have been conducted for all workers associated with these five suppliers, to ensure sound understanding of their impacts. Necessary steps have been taken to ensure all required good labor practices are adhered to, according to the Thai Labor Standard, and each supplier has passed our social responsibilities assessment.

Participation in Occupational Health & Safety Management

All employees and **workers in Tier 1 Suppliers participate in our Occupational Health & Safety Management, access to safety training, nurse room, annual health checkups,** and all requirements according to the TLS-8001:2020 Thai Labor Standard.





Occupational Health & Safety Management

TOG's Safety Officer oversees mandatory accountability for occupational health and safety actions, involving monitoring, compliance and enforcement, in line with related regulations. This dedicated position works to professionally manage occupational health and safety; conducts work-related hazard risk assessments; recommends necessary OSH training programs and evaluations best suited to business and relevant regulations; conducts incident investigation, including near-miss incidents, to analyze hierarchy of controls and suggest appropriate corrective and preventive actions, to eliminate future reoccurrence; analytically monitors key indicators to manage prompt preventive alerts; practices Emergency Preparedness & Response plans; and keeps up-to-date on new regulatory requirements, as well as improvements for workplace health and wellness.

Furthermore, appointed groups of Safety Officers at Supervisory and Management Levels also demonstrate leadership commitment to employee safety, health and wellness. Accountability at each level ensures full participation across the entire workforce, and continuous improvements with adequate resources and allocated budgetary funding.

TOG Occupational Health and Safety Policy

Thai Optical Group Public Company Limited and its subsidiary recognize the importance of facilitating healthy and safe working conditions for every person working at our facilities. We strictly comply with the laws, rules, regulations and all safety and health obligations related to our company's business operations. Together with our expert Safety Officer, our Health and Safety work team have developed the following TOG Occupational Health and Safety Policy, to demonstrate our dedication and commitment, to preventing hazards and promoting health for all stakeholders:

1). Management commitment to health and safety

Supervisors and managers at all levels shall commit to health and safety measures for all, as a top priority. All leaders shall collectively work together to set expectations and milestones, for eliminating 'work-related hazards, injuries and ill health' and 'non-work-related ill health', such as COVID-19 transmission, and shall provide adequate resources and budgetary support. All management shall commit to continuously improving the occupational health and safety (OHS) management system. This includes remaining up-to-date on advances in technology, engineering principles and healthcare protocols, to reduce workplace health and safety risks.

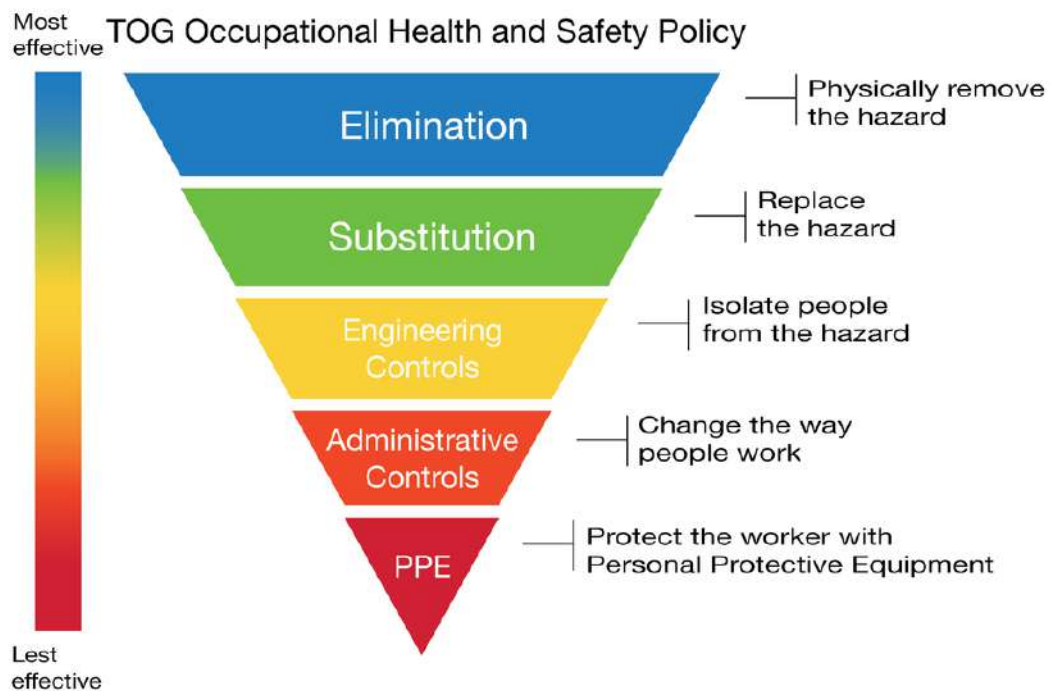
2). Worker participation in health and safety measures

All workers are to be assigned roles and responsibilities, to ensure work safety and tidiness, to maintain personal hygiene standards and workplace sanitation, and to easily identify and report hazards, investigate incidents and near-miss accidents, and track root causes, to prevent any future recurrences. All workers shall also immediately notify superiors of 'work-related' or 'non-work related' personal ill health issues, in order to manage them appropriately.

3). Hazard identification and regular assessment

The '**Hierarchy of Controls**' shall be used to identify 'work-related hazards' and assess risks on a routine and non-routine basis, and to implement the necessary control measures. Relevant guidelines, on how to work safely, are in place, in relation to Working Instructions (WI) and Quality Procedures (QP). Health and safety hazards, from routine, non-routine and emergency situations, are identified and regularly assessed. Any occurrence of incidents shall be recorded and promptly investigated with root causes identified and necessary control measures followed up with periodic inspections. Any change in people, materials, material-handling systems, tools, equipment, machines, working procedures, operation layout and working conditions shall be re-assessed, to identify new potential hazards.

Hierarchy of Controls

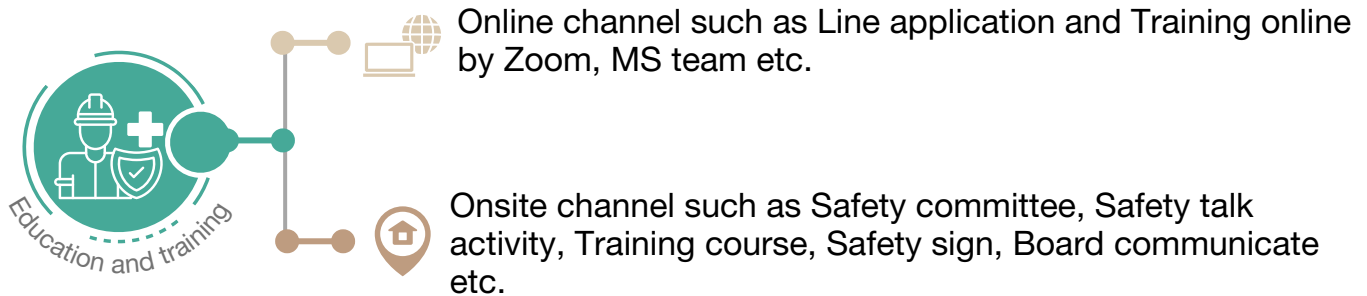


4). Hazard prevention and controls

Management, supervisors and workers shall cooperate, to identify and select methods for eliminating, preventing, or controlling workplace hazards. The **'Hierarchy of Controls'** option to be selected shall apply engineering solutions first, followed by safe work practices, administrative controls, and finally personal protective equipment (PPE). Any plan initiated shall ensure controls are implemented, interim protection is provided, progress is tracked, and effectiveness is verified.

5). Education and training

All workers receive basic training to understand how the safety procedures work, and specific training to understand the risk of 'work-related hazards' of their assigned duties and/or in their work location, as well as briefings on 'non-work-related ill health' issues, such as COVID-19 infection. All managers, supervisors and workers, at all levels, shall receive training on safety principles, personal hygiene and workplace sanitation, as well as on personal privacy data and their duty to report potential risks, imminent threats or actual incidents. All workers are trained to recognize 'work-related hazards' and 'non-work-related ill health', in order to understand the control measures and implementation thereof.



6). OHS management system evaluation and continuous improvement

Control practices shall periodically be evaluated for effectiveness. Processes are established to monitor the OHS management system performance, verify implementation, and identify shortcomings and opportunities for improvement. Necessary action must be taken to continuously improve the OHS management system, and overall health and safety performance.

7). Communication and coordination with contractors, suppliers and service providers

All contractors, suppliers and service providers commit to providing the same level of safety and health protection to their employees working at our sites. Relevant education, training and communication, on the hazards present at our worksite, the hazards contract workers may create on our sites, and/or epidemic disease risks, shall be conducted. Relevant practices, specifications and qualifications for contractors, suppliers and service providers shall be established, in advance of their arrival on site. Before hiring or work commencement, all involved parties shall coordinate with each other on the work plan and schedule, to identify and resolve any conflicts or concerns, which may affect health and/or safety issues.

Occupational Health & Safety Information Disclosure

TOG has selected relevant parts of the GRI Standards, as a guideline for reporting performance, annually, under the GRI 403 Occupational Health & Safety, in the table at the end of the Sustainability Report.



Continued COVID-19 Free Setting

In 2022, the spread of COVID-19 variants decreased, as well as sporadic infections at employee households. The COVID-19 prevention protocols and control measures remain in effect, in the workplace and dormitories, to prevent mass transmission among workers. As an elective measure, we facilitate access to vaccine boosters for employees, concerned with avoiding the risks associated with severe illness from COVID-19 infection.

Universal Preventive COVID Safety Protocols in 2022

	Q1	Q2	Q3	Q4
Undergo COVID-19 tests as per the defined schedule	✓	✓	✓	✓
Surveillance of COVID-19-confirmed cases	✓	✓	✓	✓
Additional Disinfection in affected areas	✓	✓	✓	✓
Voluntary Bubble & Seal	✓	✓	—	—
Maintain a Distance between people	✓	✓	✓	✓
Wear hygienic facemask	✓	✓	✓	✓
Routine cleaning & disinfection in all areas, canteen, air-conditioning & ventilation system	✓	✓	✓	✓
Contaminated waste disposal	✓	✓	✓	✓
Apply the same in dormitories, nurse rooms, shuttle buses, with canteen vendors	✓	✓	✓	✓
COVID-19 Vaccine Boosters (elective choice)	✓	✓	✓	✓



Product Quality & Safety Conscious Consumers

The scope of **ISO9001 Quality Management System** covers all processes from raw material selection, to compliance with hazardous chemical substance regulations, and the material qualification process, to satisfy all necessary safety requirements. Furthermore, to ensure we supply our business customers with a consistent quality of products and adequate traceability records, we have implemented the **ISO13485 Medical Device Quality System**.

This ensures all end-consumer product safety and needs are accounted for, from the very early stages of product development, through to quality testing and qualification, ensuring best-practice supply chain management from the top down, and ascertaining that all necessary working procedures are fully implemented.





Activity to Promote Innovation

Maximizing performance efficiency is part of TOG’s unwavering commitment to strengthen productive capabilities in operations, including, in part, automation transformation. As an initiative to improve productivity and nurture TOG core values, the annual **Engineering Contest** provides classroom training, coaching and mentoring sessions, job assignments, regular meetings and reviews. **The contest productively builds strong problem-solving skills, outlines pain-point profiles, encourages analytical thinking capacity and bolsters creativity, as well as hones presentation skills, necessary for production operations, and drives technological improvements, whilst also increasing production efficiency.** TOG annual operating results have demonstrated the success of these efforts with continuous improvements in performance efficiency.

Training and Education

TOG has selected relevant parts of the GRI Standards, as a guideline for reporting performance, annually, under the GRI 404 Training & Education, in the table at the end of the Sustainability Report.





Constructive Relationships with Local Communities

TOG continues to demonstrate its commitment to constructive relationships with local communities, to help create a healthier living environment together. In addition to donations of care packages and monetary funds delivered to local community in the Laharn sub-district, we also supplied the **Jaroenratupatham Primary School** with an animation clip, aimed at raising awareness on the merits and methods of recycling, to reduce landfill waste, as well as introducing an initiative to allocate pocket money rewards for English spelling competition winners.

10. Good Corporate Governance

In preparing for transitioning to Industry 4.0, a foundation of information systems and data security management is the cornerstone critically required to drive future business. In 2022, we have initiated the following information system and data security management projects.

Personal Data Protection

To correctly control use of personal data, we hired a professional consultant to conduct team education and training sessions, to work out personal data inventory, various privacy announcements, necessary consent forms, and further applicable agreements. Personal data mainly relates to employee personal information, meaning the quantity of personal data transactions does not mandate the appointment of a Data Protection Officer. Nevertheless, in order to respond quickly and efficiently to potential stakeholder queries, the company has assigned a **Data Protection Officer**, as a point of contact.



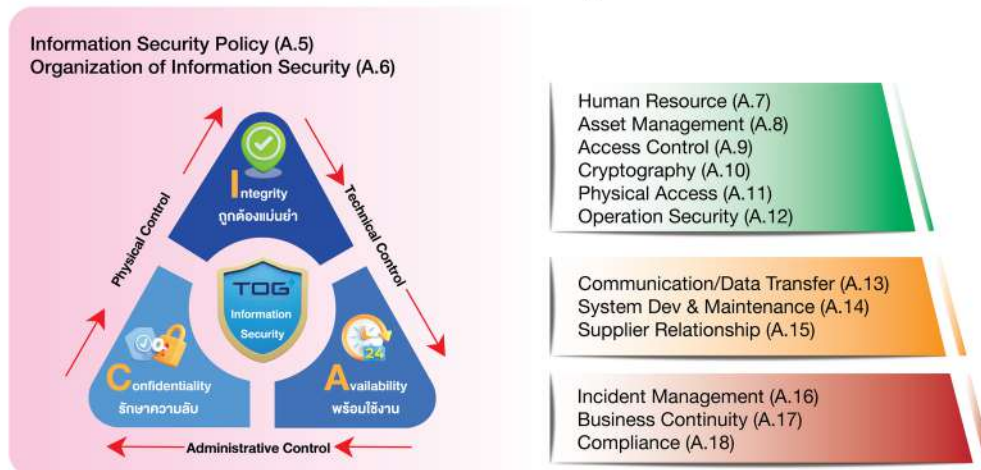
Data Protection Officer



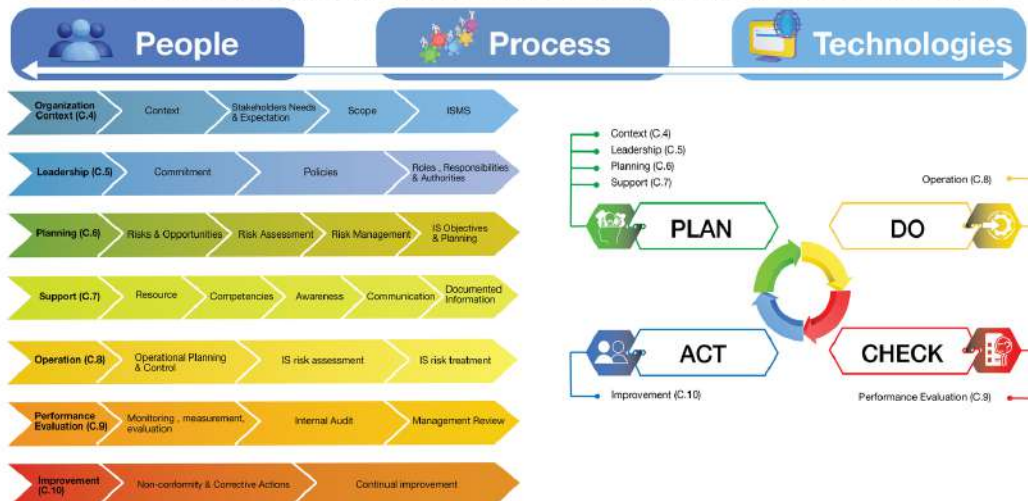
Cyber Security

The **TOG Information Security Management System Policy** was announced on our website, to demonstrate our commitment, to establishing relevant working procedures and to implementing necessary security measures, under the **ISO/IEC 27001 Information Security Management System**, which is in the process of being implemented. To this end, we have already appointed a dedicated working team and internal auditor, trained by a professional consultant.

CIA Triad & Information Security Control 14 Domains



TOG ISO / IEC 27001 Information Security Management System Requirements



Moreover, TOG participated in the **Cyber Resilience Survey 2022**, conducted by the Stock Exchange of Thailand. This helped in understanding our cyber security level, compared to the 210 peer-listed companies that also joined the survey. The results were a useful reference in formulating the next actionable steps for safeguarding the Company against potential cyber risks, which may affect business operations.

GRI content index with reference

Statement of use	Thai Optical Group Public Company Limited has reported the information cited in this GRI content index for the period from <u>1-January-2022 to 31-December-2022</u> with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	TOG 56-1 One Report Page 4, 12-13
	2-2 Entities included in the organization's sustainability reporting	Thai Optical Group Public Company Limited and Thai Optical Company Limited, its subsidiary in Thailand.
	2-3 Reporting period, frequency and contact point	1-January2022 to 31-December2022
	2-4 Restatements of information	The item does not exist.
	2-5 External assurance	TOG 56-1 One Report Page 35 Board's Oversight on ESG. Sustainability Report Page24 TLS-8001:2020 Thai Labor Standard Certification.
	2-6 Activities, value chain and other business relationships	TOG 56-1 One Report Page19-21
	2-7 Employees	TOG 56-1 One Report Page58-59
	2-8 Workers who are not employees	The number of workders are periodically varying by seasonal fluctuation of business volume. The estimated number of workers is greater than 800, to the nearest 100.
	2-9 Governance structure and composition	TOG 56-1 One Report Page39-47
	2-10 Nomination and selection of the highest governance body	TOG 56-1 One Report Page43
	2-11 Chair of the highest governance body	TOG 56-1 One Report Page41
	2-12 Role of the highest governance body in overseeing the management of impacts	TOG 56-1 One Report Page44-45
	2-13 Delegation of responsibility for managing impacts	TOG 56-1 One Report Page34
	2-14 Role of the highest governance body in sustainability reporting	TOG 56-1 One Report Page35
	2-15 Conflicts of interest	TOG 56-1 One Report Page34, 69-70
	2-16 Communication of critical concerns	TOG 56-1 One Report Page35
	2-17 Collective knowledge of the highest governance body	TOG 56-1 One Report Page54
	2-18 Evaluation of the performance of the highest governance body	TOG 56-1 One Report Page54-55

GRI STANDARD	DISCLOSURE	LOCATION
	2-19 Remuneration policies	TOG 56-1 One Report Page56, 58
	2-20 Process to determine remuneration	TOG 56-1 One Report Page56
	2-21 Annual total compensation ratio	TOG 56-1 One Report Page128
	2-22 Statement on sustainable development strategy	Sustainability Report Page6
	2-23 Policy commitments	Sustainability Report Page6
	2-24 Embedding policy commitments	Sustainability Report Page9-10
	2-25 Processes to remediate negative impacts	TOG 56-1 One Report Page208-209, Sustainability Report Page25
	2-26 Mechanisms for seeking advice and raising concerns	TOG 56-1 One Report Page35, 208-209
	2-27 Compliance with laws and regulations	TOG 56-1 One Report Page151
	2-28 Membership associations	Not applicable.
	2-29 Approach to stakeholder engagement	Sustainability Report Page11
	2-30 Collective bargaining agreements	Comply with the Labour Protection Act B.E. 2541, Thailand.
	GRI 3: Material Topics 2021	3-1 Process to determine material topics
3-2 List of material topics		Sustainability Report Page14-15
3-3 Management of material topics		Sustainability Report Page12-15
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	TOG 56-1 One Report Page130
	201-2 Financial implications and other risks and opportunities due to climate change	Sustainability Report Page19-23
	201-3 Defined benefit plan obligations and other retirement plans	TOG 56-1 One Report Page59, 98, 127-129
	201-4 Financial assistance received from government	Not applicable. The item does not exist.
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Women:Men 1:1
	202-2 Proportion of senior management hired from the local community	TOG 56-1 One Report Page58 Information on Senior Management
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	TOG 56-1 One Report Page130 infrastructure investment in our own operations.
	203-2 Significant indirect economic impacts	TOG 56-1 One Report Page 117 Share of comprehensive income and dividend received from the associated companies.
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Confidentiality constraints

GRI STANDARD	DISCLOSURE	LOCATION
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	TOG 56-1 One Report Page62-64, 68
	205-2 Communication and training about anti-corruption policies and procedures	TOG 56-1 One Report Page34-35, 193-194, 204-208
	205-3 Confirmed incidents of corruption and actions taken	TOG 56-1 One Report Page63-64. There was no incident during the reporting period.
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	TOG 56-1 One Report Page151. There was no incident during the reporting period.
GRI 207: Tax 2019	207-1 Approach to tax	TOG 56-1 One Report Page131-132.
	207-2 Tax governance, control, and risk management	TOG 56-1 One Report Page99
	207-3 Stakeholder engagement and management of concerns related to tax	Active quarterly audit by external auditor
	207-4 Country-by-country reporting	Confidentiality constraints
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Not applicable. The item does not exist.
	301-2 Recycled input materials used	Not applicable. The item does not exist.
	301-3 Reclaimed products and their packaging materials	Not applicable. The item does not exist.
GRI 302: Energy 2016	302-1 Energy consumption within the organization	42,177,000 kWhr
	302-2 Energy consumption outside of the organization	Information unavailable.
	302-3 Energy intensity	14.15 kWhr/1,000THB Revenue
	302-4 Reduction of energy consumption	5.9% reduced from the previous year
	302-5 Reductions in energy requirements of products and services	Confidentiality constraints
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Withdraw third-party water from municipal water suppliers.
	303-2 Management of water discharge-related impacts	Regular internal audit and anagement review, through ISO14001 Environmental Management System.
	303-3 Water withdrawal	Regular review of water supply, through ISO14001 Environmental Management System.

GRI STANDARD	DISCLOSURE	LOCATION
	303-4 Water discharge	Regular internal audit and management review, through ISO14001 Environmental Management System. There was no non-compliance during the reporting period.
	303-5 Water consumption	485.76 Megaliters (third-party water and groundwater)
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not applicable. The item does not exist.
	304-2 Significant impacts of activities, products and services on biodiversity	Not applicable. The item does not exist.
	304-3 Habitats protected or restored	Not applicable. The item does not exist.
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not applicable. The item does not exist.
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	2,787 Tonnes CO ₂ e
	305-2 Energy indirect (Scope 2) GHG emissions	21,085 Tonnes CO ₂ e
	305-3 Other indirect (Scope 3) GHG emissions	10,266 Tonnes CO ₂ e
	305-4 GHG emissions intensity	8.01 (KgCO ₂ e)/1,000THB Revenue) (Scope1&Scope2 Intensity)
	305-5 Reduction of GHG emissions	1.05% reduced from the previous year (Scope1&2 Emissions Intensity)
	305-6 Emissions of ozone-depleting substances (ODS)	There is no production, imports or exports of ODS in our facilities.
	305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	There was no significant air emissions.
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Sustainability Report Page16-18
	306-2 Management of significant waste-related impacts	Sustainability Report Page16-18
	306-3 a) Total weight of waste generated in metric tons	1,555.9
	306-4 a) Waste diverted from disposal	411.26
	306-5 b i. Hazardous waste directed to incineration in metric tons (with Energy Recovery)	223.742

GRI STANDARD	DISCLOSURE	LOCATION
	306-5 b ii. Hazardous waste directed to incineration in metric tons (without Energy Recovery)	0
	306-5 b iii. Hazardous waste directed to landfilling in metric tons	0
	306-5 b iv. Hazardous waste directed to Other Disposal Operation in metric tons	80.496
	306-5 c i. Non-hazardous waste directed to incineration in metric tons (with Energy Recovery)	920.970
	306-5 c ii. Non-hazardous waste directed to Incinerator Disposal in metric tons (without Energy Recovery)	0
	306-5 c iii. Non-hazardous waste directed to landfilling in metric tons	0
	306-5 c iv. Non-hazardous waste directed to Other Disposal Operation in metric tons	330.771
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	New supplier selection work procedure in place through ISO9001 management system.
	308-2 Negative environmental impacts in the supply chain and actions taken	Regular management review, through ISO14001 Environmental Management System. There was no significant negative environmental impact be identified in our supply chain during the reporting period.
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	1.05% Employee Turnover Rate.
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Health care through personal health insurance coverage and the provident fund.
	401-3 Parental leave	11 Employees
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Thai Labour Standard TLS 8001-2020 Certificate No.CL1/2020. Comply with applicable law.
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Sustainability Report Page27-31
	403-2 Hazard identification, risk assessment, and incident investigation	Sustainability Report Page29-31
	403-3 Occupational health services	Sustainability Report Page28, dedicated Safety Officers. Nurse Room comply with theThai Labour Standard TLS 8001-2020

GRI STANDARD	DISCLOSURE	LOCATION
	403-4 Worker participation, consultation, and communication on occupational health and safety	Sustainability Report Page27
	403-5 Worker training on occupational health and safety	Sustainability Report Page30-31
	403-6 Promotion of worker health	Sustainability Report Page27 Annual Health Check Up and Nurse Room.
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainability Report Page27
	403-8 a. i) Percentage of employees and workers covered by an occupational health and safety management system.	100%
	403-9 Work-related injuries	1.21 LTIFR (based on 200,000 hours worked)
	403-10 Work-related ill health	2.42 Lost Time Ill Health based on 1 Million working hours
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	6.67
	404-2 Programs for upgrading employee skills and transition assistance programs	Orientation, Onboarding program and Individual Development program.
	404-3 Percentage of employees receiving regular performance and career development reviews	100% of employees received annual performance reviews.
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Gender composition at our our governance bodies and overall employees: Board of Directors:75% Male and 25% Female, Executive Officers: 50% Male and 50% Female, Employees: 36% Male and 64% Female. Composition of all employees age group: 21% under 30 years old, 67% 30-50 years old, 12% over 50 years old.
	405-2 Ratio of basic salary and remuneration of women to men	Women:Men 0.81:1
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Regular management review through the Thai Labour Standard TLS 8001-2020 management system. There was no incident during the reporting period.

GRI STANDARD	DISCLOSURE	LOCATION
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Thai Labour Standard TLS 8001-2020 Certificate No.CL.1/2020. Facilitate annual election of employees' representatives to undertake the Welfare Committee's duties & activities.
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Thai Labour Standard TLS 8001-2020 Certificate No.CL.1/2020. There was no incident during the reporting period.
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Thai Labour Standard TLS 8001-2020 Certificate No.CL.1/2020. There was no incident during the reporting period.
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Regular internal audit & management review through the TLS 8001-2020 management system.
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	Not applicable. The item does not exist.
GRI 413: Local Communities 2016	413-1 a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programs.	100%
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Work procedure in place with internal audit through the TLS 8001-2020 management system.
	414-2 Negative social impacts in the supply chain and actions taken	There was no significant incident during the reporting period.
GRI 415: Public Policy 2016	415-1 Political contributions	TOG 56-1 One Report Page208 Business Code of Conduct 18) Political Affiliation.
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Sustainability Report Page 33 ISO13485 Medical Device Quality Management System
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	There was no significant incident during the reporting period.

GRI STANDARD	DISCLOSURE	LOCATION
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Sustainability Report Page 33 ISO13485 Medical Device Quality Management System
	417-2 Incidents of non-compliance concerning product and service information and labeling	There was no significant incident during the reporting period.
	417-3 Incidents of non-compliance concerning marketing communications	There was no significant incident during the reporting period.
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	There was no substantial breach of customer privacy or loss of customer data during the reporting period.

บริษัท ไทยออปติคอลล กรุ๊ป จำกัด (มหาชน)

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