

TOG Tax Policy

Tax Management Policy

Background and Principles

In order for Thai Optical Group Public Company Limited and its subsidiaries to ensure proper tax management and maximise value creation for stakeholders, the Group is committed to complying with all applicable tax laws and regulations. The Group shall also establish clear and consistent tax planning and operational guidelines to ensure alignment across all entities.

Policy

1. Tax Planning and Implementation Guidelines

- The Group shall manage tax matters efficiently to maximise value for stakeholders, while ensuring full compliance with applicable laws and regulations, and maintaining the Company's reputation and good relationships with relevant tax authorities.
- Tax filings shall be submitted within statutory deadlines. The Group shall also manage tax payments, refunds, and related matters in a manner that optimises the Company's financial position.
- Tax implications shall be carefully assessed for investment projects and new business transactions by relevant departments and responsible tax personnel.

2. Coordination with Government Authorities

- Thai Optical Group Public Company Limited and its subsidiaries shall appoint responsible personnel to oversee tax matters and coordinate effectively with relevant government authorities.

Tax Management for Special Transactions

Background and Principles

To maximise tax efficiency and minimise tax risks in special transactions—such as acquisitions, disposals, business amalgamations, restructuring, company incorporation or dissolution, capital increases or reductions, and other complex transactions—the Group shall ensure appropriate tax planning is undertaken.

Policy

- Companies within the Group must notify Thai Optical Group Public Company Limited in advance of any special transaction or project. The Company shall provide guidance and establish appropriate tax planning approaches aligned with the Group's structure and policies for implementation.

Examples of special transactions include:

- Mergers and acquisitions

- Business restructuring
- Company establishment or dissolution
- Capital increase or reduction
- New transaction structures with material value
- Transactions undertaken to obtain tax privileges or incentives
- Where necessary, the Company shall consider appointing appropriate external advisors and define the scope of work accordingly. Internal experience within the Group may also be taken into consideration in the decision-making process.

Tax Disputes with Government Authorities

Background and Principles

The Group shall establish clear guidelines for engaging with tax authorities and managing tax disputes to mitigate reputational and tax risks for both the Company and its subsidiaries, including matters related to business operations or transactions.

Policy

The Company and its subsidiaries shall provide accurate and complete information in accordance with actual business operations.

In the event of a tax audit or dispute with significant financial impact, the Group shall assess the implications across related entities with similar transactions and escalate the matter to management prior to proceeding with any clarification or negotiation with government authorities, in order to determine the most appropriate course of action.

Announced on 1 February 2015.