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About this report

This report is the third Corporate Social Responsibility (CSR) report issued by Apex International Co., Ltd. (Apex), which will continue to be issued annually in both Chinese and English versions. To learn more about Apex's efforts and achievements in corporate social responsibility, please visit our CSR website.

Reporting period

The period of information disclosure of this report is 2018 (January 1 to December 31, 2018), covering our vision and strategies of sustainability, responses to material issues, and specific practices and performance data in the economic, environmental and social dimensions.

Reporting Standard

The Report is compiled in accordance with GRI Sustainability Reporting Standards, published by the Global Sustainability Standards Board (GSSB) and in line with the Integrated Reporting structure from the International Integrated Reporting Council (IIRC). Apex hopes to enhance the quality of the Report, and link the various operational activities in order to conduct a fully integrated communication with stakeholders.

Note: Based on the regulation of industry type and paid-in capital announced by Taiwan Stock Exchange (TWSE), Apex does not need to prepare CSR report, such report is voluntarily prepared by Apex.

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Report boundaries and categories

The report boundaries were defined in consideration of the nature of business, industry linkage and the right to control. The financial data is taken from the consolidated financial report of Apex, which has been verified by KPMG Taiwan. For individual of the consolidated statements, please refer to the 2018 consolidated financial report. Environmental and social figures are adopted from Apex and subsidiaries which Apex owns 50% or more of its share, including Apex Circuit (Thailand) Co., Ltd. and Approach Excellence Trading Ltd. The GHG inventory standard of the report is created based on Thailand Green House Gas Management Organization's (TGO) Carbon Footprint for Organization program (CFO program), which is equivalent to ISO14064-1:2006. This standard covers the report of Carbon dioxide (CO2), Methane (CH4), Nitrous oxide (N2O).

The main subjects of this report include operational performance, corporate governance, environmental protection, and participation, which is in consistent with current international trend toward corporate information disclosure. If the scope or quantitative data measurement is different from the previous version, it will be specifically indicated in the respective paragraph. The statistics provided in the report are derived from Apex's own statistics and surveys and are presented with conventional data description manner.

¹The GHG list of TGO-CFO is the same as The Greenhouse Gas Protocol published by World Business Council for Sustainable Development, the link of the website is as below.



Letter from the CSR Committee Chairperson

Apex has always believed that a sustainable enterprise must not only excel in its core business and pursue the highest revenues, profits, and shareholder returns, it must also fulfill its responsibilities to the environment and society, and serve as an uplifting force in society.



In 2015, Apex established its Corporate Social Responsibility Policy, aiming to build on a foundation of sustainable operations and carry out our three missions of "Corporate Governance", "Sustainable Environment", and "Social Care" in our daily operations. We gain understanding of the key issues of concern for our stakeholders through organizations in our company responsible for these issues, and try our best to disclose the results of our actions through Company announcements.

Economic Dimension

Although Apex faced significant rise of material cost in 2017, under such turbulence, Apex started to proceed improvements in order to decrease production cost then was able to face challenges from the environment. During July of 2017 to June of 2018, Apex kept strengthening SOP of fundamental employees; built up costing control team to closely communicate with production line to find room for improvement; improved purchase strategy on supplies; improved manufacturing process etc. These made operating performance quickly improved in 2018. It was made by the whole members of Apex.

As the Top 2 rigid PCB manufacturer in Thailand, Apex hopes to leverage its hard-won leadership position in the industry and move our supply chain towards sustainable operations. We were making labor and environmental standards a part of our audits and requiring suppliers to follow the RBA (Responsible Business Alliance) Code of Conduct.

Environmental Dimension

In 2018, in addition to achieving our targets in energy saving, water conservation, waste reduction, and other environmental goals, Apex plans to set up renewable energy supply device, wastewater reuse and carbon footprint inventories and disclosures.

Social Dimension

Our focus is on employee rights and social participation. Employees are Apex's greatest asset, and we pay close attention to their physical and mental health as well as their work environment. Each factory must maintain the ISO 14001 and the OHSAS 18001 (occupational health and safety) management system standards. In 2018, we provided more than 6,000 job opportunities, and retained talent with competitive compensation, diverse training courses, vacation time above regulatory requirements, and an array of work-life balance measures.

We take the initiative to care for employees, and our employees are happy to give back to society after work, creating a positive cycle to make society better. In 2018, Apex provided book donations to schools, blood/money/supplies donation to hospitals, and work opportunities to blind people among other things. Apex spends approximately 0.34M baht for Community/Social event and donation, total 9 events in 2018.

Progress Towards a Sustainable Future

Corporate Social Responsibility encompasses the three dimensions of economy, society and the environment. In this period of volatility for the global economy and environment, fulfilling corporate social responsibility not only supports the fundamentals of our operations and reduces or eliminates risk, it also builds sustainable value for Apex and its stakeholders.





Short-term goal

In addition to achieving the established environmental goals of energy conservation, water conservation and waste recycling, Apex keeps on setting up renewable energy, research on wastewater recovery programs, and GHG inventory disclosure of Thai factories.

Mid-term goal

implement Continue to the strategic objectives of corporate governance and corporate social responsibility. In 2018, although the revenue scale of Apex has not yet become the top 10 comparing to PCB competitor, Apex ranked 6%-20% of all TWSE listing company in the FY2018 TWSE corporate governance evaluation which announced in 2019. It shows that our efforts have been social affirmed in corporate responsibility.

Long-term goal

Apex expects itself to become a corporate citizen with a positive influence on society, and build a better future for the next generation.

Chief Executive Officer Chou, Jui Hsiang



Competitive Advantage

Excellent corporate management

Apex's management is dedicated to the company, maintains business stability and growth, endeavors in sustenance of internal communication channels, and also adheres to five major management concepts: 1. Best quality, 2. Best prices, 3. Punctual deliveries, 4. Excellent service and 5. Fulfillment of promises.

Diversification of client sources and Product applications

Apex's client spread around Japan, Korea, Europe, North America and China and major international manufacturers are among the end-customers. Diversification of client sources reduces the influence of the economic situation of a single country or region on Apex. In the meantime, diversification of product applications, including electronic products, computer-related, communications and automotive products, will enable Apex to stand out as a company capable of meeting the various needs of clients and its product development can also create complementary effects.

Cost control and product price

Complicated production processes and production according to orders are the characteristics in PCB's manufacturing. Hence, precise and effective management are the foundation for maintenance of competitiveness and creation of profit. Whole production processes of PCB are in-house, so Apex can control the scrap rate of each work-station and thus decrease producing cost. At the same time, Apex has centralized sale and procurement so as to reduce time lag. Finally, good cost control has resulted in competitive product price.



Advantages and disadvantages of the development vision and favorable factors for responding to the countermeasures

Advantageous factors

Geography and people of Thailand

Thailand is a transportation hub in Southeast Asia with abundant resources. Being an ASEAN member state, it has regional economic advantages that attract foreign investors. With the integration of AEC in 2015, Thailand will continue to enjoy advantage of exporting into South East Asia and doing cross border trade with zero tariffs. In addition, Thailand's people are friendly and loyal, which enables the company to maintain a low turnover rate to maintain production efficiency and quality.

Labor cost and labor consciousness

Despite the Thai government's announcement in recent years to raise the minimum wage, Apex has been able to keep management costs at a lower level through cost control. Fully aware that the lower labor cost in Thailand is a major contribution to its gross profit, Apex has therefore continued to increase investment in automation to reduce its dependence on labor in the future. We have also invested in automated equipment to reduce the cost of intensive labor.

Market share and demand

Apex understands very well that cost competitiveness, decent service and responsibilities are necessary abilities for the company to survive in the electronics industry, keep customers and develop new sources of clients. We have continued to expand our market share through current customers and seek new ones to fill the production capacity of the new plants. Besides continuous acquisition of machine equipment for the new plants, Apex also makes persistent efforts in development of new products and technologies to bring up production to meet market demand as well as win opportunities to serve more customers and increase business. Apex has price advantages to compete in the market and continues to maintain close relationships with customers and develop new sources of clients.



In recent years, production costs have kept rising in China as a consequence of growing labor costs which are subject to the policy of the Chinese government. Plus the increasingly strict environmental protection policy, PCB businesses along the eastern coast have begun to relocate to the inland. Although production costs in the Chinese inland are relatively lower, the hardware facilities and logistic services are not as progressive as those in the eastern region. This has created certain pressure on our competitors. Being based in Thailand gives Apex certain relative advantages.



Logistic advantages in Thailand

Today, the land transportation systems in Thailand have been greatly improved. Moving goods from Thailand to anywhere in China takes only 7-10 days. Delivery time is shortened, costs are reduced, and competitiveness is boosted. For raw materials, there are four suppliers able to provide board materials. Apex also purchases services needed for production from Thailand suppliers to cut down on waiting time.



Awakening of environmental protection awareness

Apex has implemented a number of projects in recent years, including power and waste water treatment facilities, to reduce environmental impacts. We believe the rate of return on investment of these projects will be worthwhile. Overall, we have seen initial results. We will continue our effort to control costs to ensure that the funds spent on environmental protection will not affect the profitability of the company.

Countermeasures

Apex continues to improve production processes to reduce contamination, adopt environmental strategies and bring in contamination prevention equipment to meet environmental protection regulations, and also commission qualified environmental protection businesses to dispose of contaminated waste to reduce environmental contamination and environmental protection expenses.



Fierce market competition

The PCB industry is the mother of the electronics industry. Price reduction pressure from customers never stops and this is the fate of this industry.

Countermeasures

Apex continues to improve sales tactics to maintain plant utilization rates at over 90% and is therefore able to offer competitive prices and ensure reasonable profit. Increased customer demand for multi-layer boards will boost our average sales price and profitability. Production of 2-layer boards continues to decrease while that of multi-layer boards is on the rise. This enables us to cope with competition from other regions.

Impact on profitability from exchange rate fluctuations

Exchange gains/losses will have an impact on the final profit of the company. By adopting natural hedging strategies and cautious operation of certain derivatives, Apex has reduced the likely impact from exchange rate fluctuations by a large margin.

Countermeasures

The finance department tries to cover the purchase and related expenses with the sales income of the same currency to achieve the natural hedging effect. Over time and changes in the foreign exchange market, collect information on the exchange rate market and future trends, exchange in a timely manner to reduce exchange rate risk, and assess the status of foreign exchange contracts and options at any time.

International raw material price fluctuations

Apex takes active measures to negotiate prices with suppliers of important raw materials, such as CCL, Prepreg, copper foil, solutions and dry film.

Countermeasures

Apex keeps a close watch on price change tendencies and purchases needed quantities in advance when prices are at low points in order to maintain low material costs. We also keep good relationships with suppliers to ensure all material costs achieve our expectations. Apex also conducts cost control through quarterly plans to comply with budget arrangements.

Organization Profile

The main axis of Apex culture is "Oriental Thinking collaborating with Western Management" while working. "Oriental Thinking" means to treat others with sensibility. At the same time, the concept of "benevolence" is definitely helpful for Apex and is the foundation to achieve harmony and tolerance among teams. Apex people have to keep empathy in mind all the time in order to understand the opposite side's point of view. Then, effectiveness of communication can be created and we can further achieve operating goals. "Western Management" emphasizes spirit of compliance of regulation. Apex people have to comply with laws, regulations and internal control system precisely and carefully as a foundation for maintaining competitiveness.

Apex is a professional manufacturer of PCB and has over six thousand employees, most of them are of Thai nationality. Apex has two factories in Samutsakhon which is located at south-west of Bangkok. Apex has focused on 2 to 12 layers of PCB's products and monthly capacities of over 490 thousand square meters. In 2018, the consolidated revenue and operating profit were 11,175 million NT dollars and 830 million NT dollars, respectively.

Business of Apex and its Subsidiaries

The main business operations of Apex Group are production and sales of double-sided and multi-layer rigid printed circuit boards (PCBs). The products are sold locally in Thailand and also exported to 25 countries in different countries of the world, including China, Korea, Latin America (Brazil), South Africa, Russia, Tunisia, Europe and USA.

Consumer electronics makers that are clients of the group include Samsung, Arris, Technicolor, Hewlett-Packard (HP), Canon, Toshiba and Western digital. The PCBs produced by the group are mainly applied in LCD TVs, set top boxes (STBs), hard disks, printers, wireless transmitters, TFT panels, and multimedia products for automobiles.

New product and service items to be developed

The consumer products like LCD TV, STBs and home entertainment market continue a moderate growth in 2018. Almost all Japanese brand manufacturer face decreasing market share. We have already started to approach and/or develop new products for automotive parts, mini WI-FI, RF application products and PCB transformer products, etc. These products enable us to take advantage of our new facility and upgraded manufacturing capabilities especially automotive and notebook. It is expected to see further improvements in 2019 onwards.

On the other hand, our factories also have enhanced facilities to provide our customer with more surface finishing options like Immersion Tin, Lead-free HASL, Carbon finishing. Due to market design continuously reducing PCB size, higher holes density and thinner line width spacing, the use of via-in-pad technology in rigid boards are growing and factories have also added this capability to keep up with market trends.



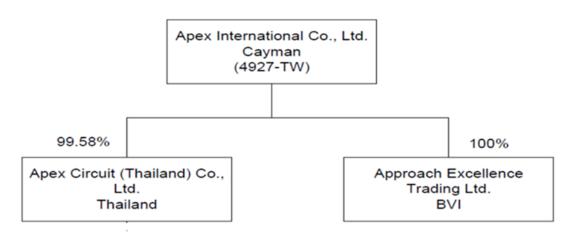




Company profile and operation base

Company Overview

Apex was established on October 28, 2009 and is registered in the Cayman Islands. The company's main business projects are the manufacture and sale of double-sided, multi-layer, printed circuit boards (PCBs). Applications include LCD TVs, video converter boxes, Set -Top Box, STB, hard disk, printer, satellite communication equipment and multimedia equipment for vehicles. The following are the headquarters location, operation base and investment structure of Apex and the main business items of each base:



Company Type	Country	Company Name	Hereinafter referred to as	Address
Headquarter	Taiwan	Apex	API	Rm. 503, 5F., No. 205, Dunhua N. Rd.,
		Internationa		Songshan Dist., Taipei City 105, Taiwan
		l Co., Ltd.		Tel: +886-2-27170032
Subsidiary	Taiwan	Approach	AET	1F., No. 21, Ln. 1314, Chunri Rd.,
		Excellence		Taoyuan Dist., Taoyuan City 330,
		Trading Ltd.		Taiwan
				Tel: +886-3-316-9896
Operating	Taiwan	Apex Circuit	APT	APEX 1:
headquarter		(Thailand)		39/234-236 Moo2, Rama 2 Rd.,
and plants		Co., Ltd.		Bangkrachao, Amphur Muang,
				Samutsakhon 74000, Thailand Tel: +66-34-490537
				APEX 2:
				30/101,102 Moo 1, Sinsakhon
				Industrial Estate Chetsadawithi Rd.,
				Khok Kham, Muang, Samutsakhon
				74000, Thailand
				Tel: +66-34-119225



Main business operations of each subsidiary

- 1. Apex is mainly a holding company and conducts no actual business activities.
- 2. APT is 99.58% owned by Apex. It was founded in September 2001 to be the production and operating center of the group. The PCBs APT produces are mostly exported to Japan, Korea and China to be used principally in consumer electronic products and office equipment and then in STBs, communications equipment, computer equipment and auto parts.
- 3. AET is a wholly-owned subsidiary of Apex. A Taiwan branch was set up to be in charge of procurement of machine equipment and raw materials and shipment in the Taiwan area.



Numbers of Employees

All workforces are under contractual agreement with Apex. No significant variation in employment number. The table below showed their average length of service, average age and educational level in all offices.

	Year	FY2017	FY2018
	Managers	78	71
Number of	Production Departments	4,300	4,298
Employees	Common Employees	2,013	2,128
	Total	6,391	6,497
	Manager level or above	84 ²	81 ³
Position	Common Employees	6,307	6,416
	Male	2,692	2,790
Gender	Female	3,699	3,707
Dogianal	Taiwan	14	10
Regional	Thailand	6,377	6,487
	Over 50 years old	61	61
Employee structure	30-50 years old	2,573	2,604
	Under 30 years old	3,757	3,832
	Average age	29.17	29.33
Avera	age length of service	3.09	3.37
	Master and above	10	7
Educati	University	1,045	380
Education Level	Senior high School	2,650	3,439
	Below senior high school	2,686	2,671



Identified Material Aspects And Boundaries

Apex has established its corporate social responsibility best practice principles; they have been approved by the board of directors and the results of implementation are reviewed by BOD meeting regularly. The RBA committee then review the issue raised by stakeholder engagement process, mapping to GRI aspect as below.

Through stakeholder inclusiveness, sustainability context, materiality, and completeness, Apex recognizes the GRI Standard principle that is applicable for Apex to define the core content of the Report. Apex demonstrated these principles by means of stakeholder engagement processes which is done by various departments who made directed contacted with those parties.

Apex has engaged with stakeholders to capture current issues regarding their interest and concern with Apex. These include, but are not limited to GHG emission reductions, Environment management, Green products and employees' welfare and the competitors' review of materiality issues, to make a conclusion on Apex materiality.

This Report context provides sustainable action taken i.e., reduction in waste generated and improvement in GHG emission. Top management as well as RBA committee also review and endorse the materiality issues to ensure the significance to company and stakeholders as well as the 360-degree view for stakeholders.

²43 of this position is Thai employees, accounts for 51.19% of employee of the manager level.

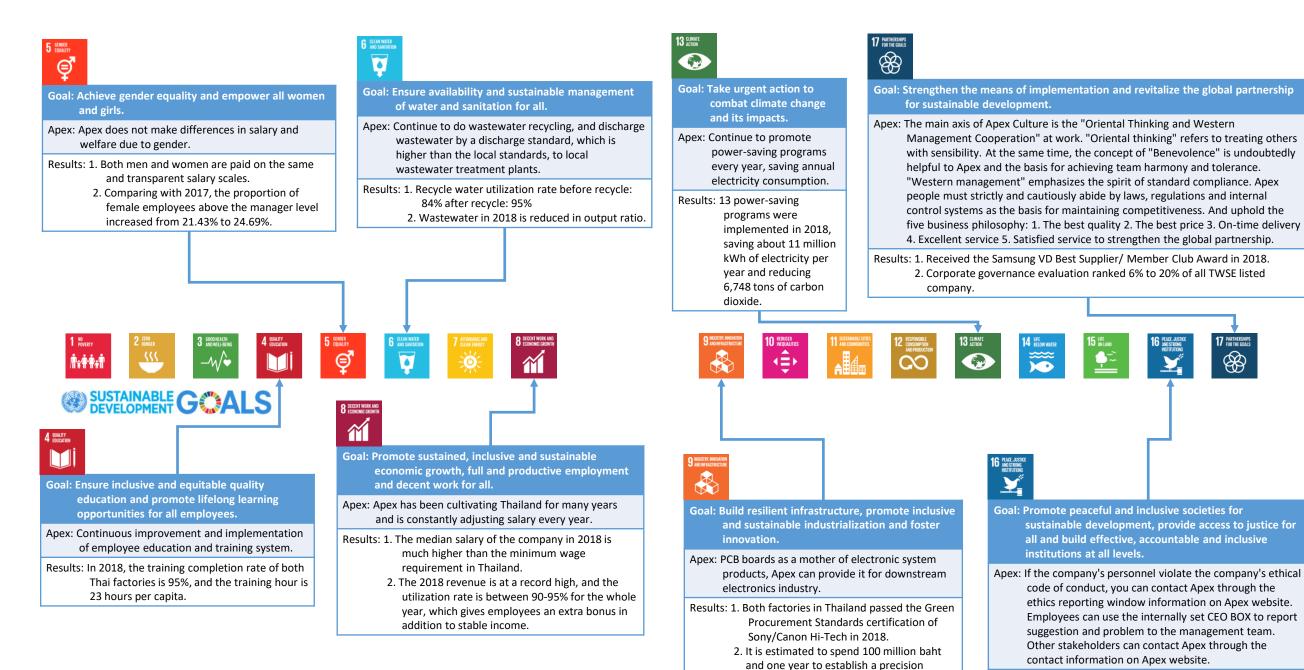
³47 of this position is Thai employees, accounts for 58.02% of employee of the manager level.

Results: Apex 2018 has a harmonious labor-management

relationship and no labor disputes have occurred.

Major identified issues and boundaries corresponding to the UN's 17 Sustainable Development Goals (SDGs)

17 Sustainable Development Goals (SDGs) have been was set up. Apex can combines 8 target requirements based on its core competencies.



physics laboratory, through internal

control to grasp the problem in the first

time and effectively solve the problem.

Note: The median salary and local minimum wage for 2017 and 2018 (unit: Thai baht) are as below.

			`	•	
		FY2017		FY2018	
		Male	Female	Male	Female
Assistant Manager level or above	Median	54,179.58	44,269.19	57,205.38	48,268.15
Common Employees	Median	10,675.97	11,210.80	11,007.23	12,736.66
Local minimum wage		310 /Day		323	/Day

The detail of consolidating are kept at relevant departments included but not limited to customer survey, minutes of meeting with stakeholders as well as all kinds of feedback and information gained through the whole year.

Hence the sale operations in Taiwan and China are under the control of the Thailand management team, therefore, the engagement processed with mentioned International customers and all information gathering from overseas offices is then consolidated at Thailand Office. These initial issues are the reviewed and endorsed by RBA committee as Apex's aspects for the year 2018.

Stakeholder	Concerned issues	Response Department	Way of communicating and interacting	Frequency
Society	 Compliance with laws Environmental protection Waste Management Eliminate the gap between urban and rural education Volunteer service Donation activity 	RBA committee, ADM	 Local wastewater treatment plant inspection Community activity 	Irregular
Customer	 Product Quality Product Delivery Good service Reasonable Pricing Green products Non-conflict mineral resources audit Protection of confidential information 	Sales, CQM, ADM, R&D	 Telephone, Email Meeting, Bilateral Visit Internal and external audits Customer satisfaction survey 	 Frequent on weekdays Irregular More than 2 times a year More than once a year
Employee	 Employee welfare Occupational Safety and Health 	Employee welfare committee, ADM	 Telephone, Email Face book fan page Internal website and announcement Welfare Committee CEO BOX Regular and irregular meetings 	 Frequent on weekdays Frequent on weekdays Irregular More than once a month Irregular Irregular





Stakeholder	Concerned issues	Response Department	Way of communicating and interacting	Frequency
Government	 Green products Greenhouse gas reduction Waste Management Energy and electricity reduction Regulations compliance 	Taiwan branch, accounting, ADM	 Official letters Social media Website Email Market Observation Post System (MOPS) 	 Irregular Irregular Irregular Irregular In accordance with relevant regulations
Shareholder	 Competitive advantages Growth potential Dividend policy 	Taiwan branch, accounting	 Shareholders' meeting Investor Conference Contact window of Spokesman MOPS Company website 	 Once a year Irregular Frequent on weekdays In accordance with relevant regulations Irregular
Supplier	Supply Chain ManagementCorporate Governance	Purchase ` ADM ` Production	Field reviewPhone, EmailMeeting	 At least once a year Frequent on weekdays Irregular

Corporate Governance

Apex already built the following CSR related internal regulation:

- 1. Principle of Corporate Governance
- 2. Principle of Corporate Social Responsibility
- 3. Ethical Corporate Management Best Practice Principles / and its Guidelines for Conduct
- 4. Rules for Election of Directors / Rules of Procedure for Board of Directors Meetings / BOD Performance Evaluation Procedure
- 5. Rules for Control Audit Committee / Compensation Committee
- 6. Regulation of the Scope of Duties of Independent Director

In Apex, Internal audit office is in charge of the CSR managing issues and reporting to BOD meetings. APT already set up RBA Committee and Energy Conservation Committee.

In 2018, although the revenue scale of Apex has not yet become the top 10 comparing to PCB competitor, Apex ranked 6%-20% of all TWSE listing company in the FY2018 TWSE corporate governance evaluation which announced in 2019. It shows that our efforts have been affirmed in corporate social responsibility.

Ethics & Integrity

The "Ethical Corporate Management Best Practice Principles" and its guidance policy of Apex stipulate the types of unethical conduct, improper benefits and the whistleblower channel for both insiders and outsiders. All Apex workers are requested to act in accordance with business ethics and their responsibility to the public and stakeholders. At the same time, the members of the board of directors and the management all carry out their duties with integrity and fulfill their obligations as good managers. They also abide by the code of conduct for directors and managers and adopt strict self-discipline and cautious attitudes when exercising their duties.

The company policy already included the whistleblower system to have independent directors and internal audit manager to take the responsibility of ethical issue and inspection. The channel was as below:

- 1. Internal: CEO box
- 2. External: Company official website to disclose the contact method of internal audit manager. There was no case of ethical issues through the whistleblower system in the year 2018, and no abnormal issue through regular internal audit report related to any of the topics below:
- Benefit provided by outsider
- Commitment to outsider
- Political contributions
- Large donation
- Large donation
- Business secrets or intellectual property

- Private transactions
- International regulation compliance
- Stock insider trading
- Customer/Supplier ethical issue

Regulation Compliance

- 1. Apex has established its Corporate Governance Best Practice Principles. The Principles have been disclosed on the Corporate Governance page on the company website after being approved by the Board of Directors.
- 2. Apex has established Principle of Corporate Governance as the guidelines in the internal control system for processing shareholder inquiries and matters in relations to shareholders' rights and interests. At the same time, there is a spokesperson and two deputy spokespersons to provide prompt replies to questions from shareholders.
- 3. The insider lists of Apex is compliant and files the shareholding status of the principal shareholders each month as regulated.
- 4. The division of management authority, contact and transactions between Apex and its subsidiaries and affiliates are all conducted according to the regulations of the internal control system and relevant operating procedures.
- 5. Apex has established regulations on prevention of insider trading and also regularly reminds company personnel such conduct is prohibited.
- 6. The composition of the board of directors is determined with professional background, gender, age and education taken into consideration and also diversified for the purpose of complementation to increase the overall capacity of the board.
- 7. In addition to the Remuneration Committee and the Audit Committee, committees of other functions has been created in accordance with the company's business development and related regulations.
- Apex has established regulations on evaluation of the performance of the board of directors. The approaches of evaluation and performance evaluation will be conducted accordingly. Please refer to the company's official website for the evaluation results.
- 9. Apex evaluates the independence of CPAs annually, ensuring that they are not Board member, Remuneration member, shareholder or stakeholders of the Company. The 2018 Assessment of performance and independence of CPA were approved by Audit Committee and Board of Directors on March 1, 2018. Please refer to Section 5 "To review the independence of the CPA periodically and the items of evaluation", in Chapter VIII Supplementary Information of Apex FY2018 annual report for details.
- 10. Apex has already set up the Corporate Government Team under BOD meeting who is in charge of corporate government, corporate social responsibility and ethical affairs. EveryEach December of year, the team will directly report to the BOD meeting about the implementation and the plan of next year.
- 11. Apex has set up a stakeholder section on our corporate website, and the information about various financial operations and corporate governance are also revealed on the website. Apex also set up the contact window for stakeholders and has disclosed the contact information on the website.
- 12. Apex has commissioned a professional shareholder services agency to handle the affairs of the shareholders' meeting.
- 13. Apex has already set up an English website. Questions in relation to Apex are replied by the spokesperson or the deputy spokesperson. The related departments and the spokesperson or deputy spokesperson are in charge of collecting and disclosing company information. If there are any institutional investors' conferences, the information will be posted on the company's website and the MOPS.

Employee rights and interests and Employee care

- 1. Employment equality: Job seekers and employees are treated equally, regardless of their gender, ethnic background, religion, political affiliation or marital status and employment of child labor is forbidden. Pregnant employees are given provisions and longer breaks.
- Besides conducting physical checkups for employees regularly, the company values the health and safety conditions in the work environment for employees and has passed the Occupational Health & Safety Adversary Services certification OHSAS 18001 and the External Audit Certification of the Environment Management System ISO14001.
- 3. The Employee Welfare Committee organizes at least one activity for full-time employees each year and a welcoming party for new employees each month. The head of each department is invited to participate in interactive games to upgrade employees' sense of belonging and engagement.
- 4. Recruiting blind people to the factory to provide massage service for Apex employee each month, which provides job to blind people and relaxes the working pressure of Apex employee as well.



Investor Relations

In order to assure the rights of Apex's shareholders, Apex has set up contact window to deal with the issues raised by shareholders. Apex also set up the Chinese/ English website to provide the following information:

- 1. The information of the Articles of incorporation and corporate governance.
- 2. Documents related to shareholder's meeting. (At least the latest annual report, meeting notice, meeting agenda and meeting minutes of the Annual General Meeting.)
- Company profile, including company history, product, service provided, company organization, and management team.
- 4. Major shareholder information (Including names of shareholders in possession of more than 5% of total shares or ranking among the top ten shareholders, the amounts of shares held and shareholding ratios)

Besides, Apex also set up a stakeholder section on our website, in order to understand the key CSR issues which our stakeholder care



Relations with suppliers

The main operating entity of Apex has built up close relationships with suppliers and both sides reciprocate based on mutual trust to achieve the win-win policy.

Rights of stakeholders

Apex maintains smooth communication channels with correspondent banks, employees, customers and suppliers and also respects and sustains their rights and interests.

Director and manager training

Please refer to Section 5 "Continuing Education for Directors and Managerial Personnel" in Chapter VIII Supplementary Information for details.

Implementation of risk management policy and risk assessment criteria

Please refer to Section 6 Risk in Chapter VII Review and Analysis of Financial Status and Performance and Risks for details.

Execution of customer policy

Apex has set up a customer service department and a permanent customer service window to process customer complaints and communicate and understand the needs of customers in order to make improvements. Also, customer satisfaction surveys are administered through regular visits and irregular contact. Adjustments are then made according to the survey results so that the company can continue to provide the best service to customers.

Enrollment of liability insurance for directors

Since 2012, Apex has taken directors' and officers' liability insurance. The insured amount in 2018 was US \$3 million.

Personnel associated with financial information transparency have acquired required certificates

Two certified public accountant in Thailand.

According to the categories and requirements of the Corporate Governance Evaluation held by TWSE each year, Apex proceeds self-assessment and report the performance to BOD meeting. In year 2018, Apex perform 91.82 score of the evaluation, which means Apex was ranked within 6%~20% of all companies listed in TWSE.

Environment Protection

Apex products produce three common waste products, including greenhouse gases, process waste, printed circuit board waste, and wastewater.

GHG emission

Apex is aware of global concerns on the climate change and Green House Gases (GHG) emissions and materiality for all organizational departments to take action on GHG emission reduction. Apex has established the first GHG inventory as initial review for materiality in this issue since 2016. This information then leads to company objective in energy conservation and GHG emission reduction as tentative for 5% GHG emission reduction within the next 5 years.

Apex operations mainly consumed electrical energy for manufacturing and power supply, working on energy conservation program led to gradual decrease in both energy consumption and GHG inventory.

2018 annual energy saving implementation:

- 1. Both plants focused on improving air pressure/air conditioning/ice water systems and replacing energy-saving bulbs to improve the energy efficiency of the system by 20%.
- 2. In 2018, Apex process 13 energy saving project and saved 11,000,000kWh, i.e., reducing 6,748 ton CO2 emission.

Other type of GHG concerns are from the supply chain, so Apex chose to establish GHG scope 3 inventory for premium freight as initial information. Apex is expecting to expand the inventory for all mode of transportation and evaluate appropriate work with supplier to control of GHG scope 3.

Apex has established GHG inventory in the year 2018 applying TGO-CFO (Thailand Green House Gases Management Organization - Carbon footprint for Organization) scheme (as equivalent to ISO14064-1:2006) as reporting standard. This standard covers the report of Carbon dioxide (CO2), Methane (CH4), Nitrous oxide (N2O) as applicable to consolidation of Apex's operational control approaches. The following is the GHG inventory (report in tCO2e) of Apex 2017 and 2018:

	FY	2017	FY	2018
Category	GHG	Scope 1 &2 Ratio	GHG	Scope 1 &2 Ratio
Scope 1	10,382.17	6.32%	10,608.60	6.90%
Scope 2	145,180.76	88.41%	142,537.51	92.75%
Scope 3	8,637.06		518.28	
Biomass Fuel	11.76		7.92	
Total	164,211.74	94.73%	153,672.30	99.66%

When consider GHG intensity, Apex take account of GHG Scope 1 and Scope 2 which demonstrated 13.75 tCO2/Million NT\$ revenue for the year 2018.

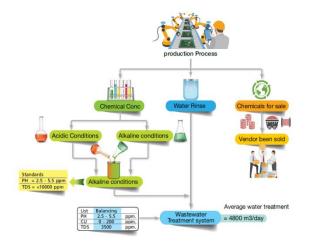
Waste Chemical / Water and PCB

Apex keeps focusing on improvement of waste chemicals treatment through the recovery of effluents. With new investment in the Copper recovery facilities, the collected copper from waste chemicals waste totaled 102 tons in 2018, and 100% recycle Spent AL Etching chemical, total 1,373 tons recovery respectively. These metals recovered then are sold back to supplier as recycling materials. For PCB scrap, this material then led to secured landfill with total disposal weight of 400 tons in the year 2018.

Water resources

All environmental protection policies made by Apex's Corporate Social Responsibility Management Committee are based on different environmental regulations. The wastewater discharge inspection standards of Apex is stricter than those imposed by the Ministry of Industry of Thailand for wastewater discharge system quality control in industrial zones in order to reduce the impact of production activities on the environment. The following table reveals the standards of wastewater discharge in industrial zones:

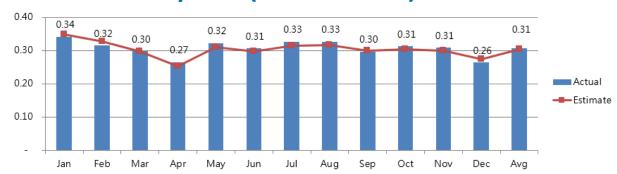
Parameter	Unit	Recommended Standard	Apex Standard	Detection Method
рН		5.5-9.0	Compliant	Electrometric Method
Total Dissolved Solids (TDS)	Mg/l	3,000	Compliant	Dried at 103-105°C
Suspended Solids (SS)	Mg/l	200	Compliant	Dried at 103-105°C
BOD	Mg/l	500	Compliant	5-Day BOD test, Azide Modification
COD	Mg/l	750	Compliant	Closed Reflux, Colorimetric Method
Copper (Cu)	Mg/l	2.0	Compliant	Nitric Acid Digestion and Cirect Air Acetylene Flame : AAS
Oil & Grease	Mg/l	10	Compliant	Soxhlet Extraction Method



Wastewater recycle flow chart- before discharging to Sinsakhon Industrial Estate wastewater treatment plant

According to Sinsakorn Industrial Estate, Apex is obligated to control waste water in accordance to standard parameter prior discharge waste water to wastewater treatment system of Industrial Estate. In2018, Apex consumed around 3.69 million cu.m of water. The volume of waste water discharge is approximately 3.10 million cu.m. Apex Thai factory has projected to recycle water utilization rate before recycle: 84% after recycle:95 %.

Water consumption (million cu.m)



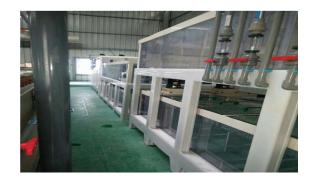
Waste water discharge (million cu.m)





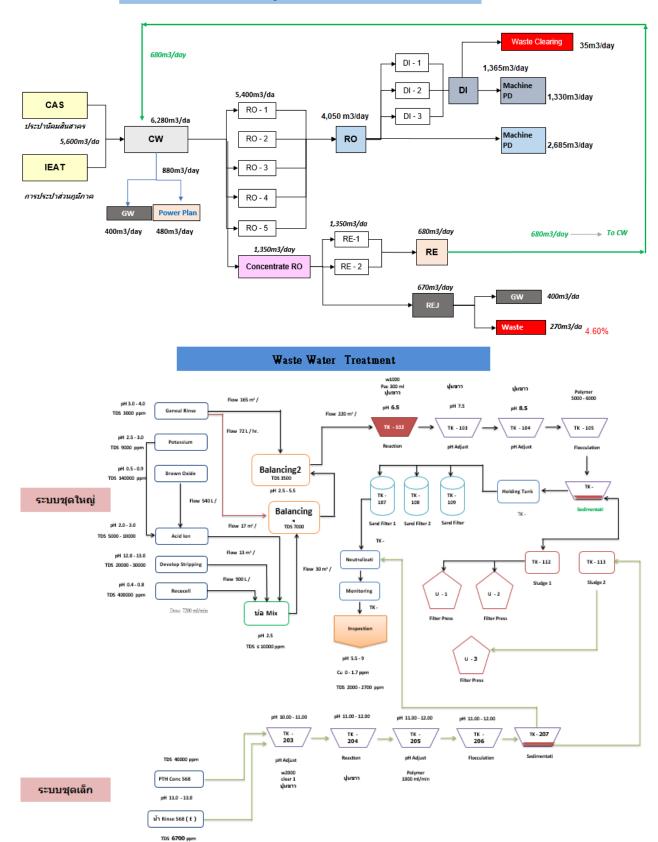








Water System flow chart



Social Investment

Apex will move forward form philanthropy to social investment approach as the management recognized the late King Rama 9's "Self-sufficiency philosophy" where education and essential infra-structure will enhance community to create social value by their own.



Care for vulnerable groups

- 1. Establish scholarships and awards, and present the ceremony to the children of the company's outstanding employees.
- 2. Provide job opportunities for the blind, come to the factory to provide massage services every month, and pay labor costs of about THB 880,000.



Community activities

- 1. The Songkran Festival in Thailand organizes monks to pray and donate food, maintain local traditional culture and enhance regional identity.
- 2. Donate candles, drink water to the temples around the Thai factory, and sponsor their traditional blessings.
- 3. Donate scholarships to neighboring primary schools and provide material sponsorship community activities.
- 4. Cooperate with local hospitals every season to hold employee blood donation activities.



Environmental protection

- 1. Adopt the greening project around the factory.
- $2. \quad \hbox{Organize the planting of mangroves}.$
- 3. Prosthetic material donation program: collecting beverage pull ring donated prosthetic manufacturing company.

In the year 2018, Apex allocated 0.34M Baht to support social activities, mainly to communities' needs. Employees also participated in Blood donations and Mangrove plantation as part of company CSR champagne.

















Happy and Safe Workplace

Apex's top management put Safety, Occupation & Health issues as top priority for all employees and third parties working on Apex's operations. The 6,000 employees in Apex are an important resource for successfully maintaining Apex operations, with the theme "Apex and Employees cannot be apart". Thus, Apex's operational target aim at Zero accidents.

Apex's working rule and regulation follow the spirit of International Bill of Human Rights with the following major concerned items:

- A. Elected Welfare Committee;
- B. Caring for vulnerable group and hold occasional donations;
- C. Prohibiting the use of child labor;
- D. Human resource policies do not contain differential treatments based on gender, race, socioeconomic status, age, or marital and family status;
- E. Achieve equality and fairness in employment, hiring conditions, remuneration, benefits, training, evaluation, and promotion opportunities.

Employees can offer suggestions and point out problems to the management team through the CEO Box and other channels. In the year 2018, no employees' complaints occurred. The labor-management relationship in Apex is harmonious; no labor-management disputes have ever occurred. Apex has established a reasonable salary and remuneration policy and performance evaluation systems; achievement of corporate social responsibility work targets is included in performance evaluation.

Apex has set up a safety division which regularly inspects whether the work environments comply with safety regulations to minimize workplace safety hazards. Apex also regularly provides employees with physical checkups, hoping that they can be aware of their health condition and employees' physical and mental health can be improved. Apex's subsidiary APT has also passed the OHSAS 18001 certification because of the fine healthy and safe work environment it created.









Labor-management relationship

Apex is in the electronic industry, which is labor intensive. Thus labor-management relationship is very important and our stakeholders and operators in the supply chains shared the same expectation on this issue. To address and respond to this issue, Apex has declared and disclose information related to labors regulation and practice in industrial sectors e.g., TLS, Responsible Business Alliance (RBA) and has improved working conditions to meet international practice, aiming to have zero complaints on labor issues. Apex has fair and equal treatment to all employees and the application for working overtime is on voluntary basis.

The Human Resource Department assists the head of each department to set up annual training programs in accordance with each department's work targets and function requirements. It has also established the promotion evaluation standard for each level to ensure the company can achieve the goal of cultivating talents, retaining talents and using talents.

Employees' welfare system

- (1) Multiple shuttle bus routes providing transportation for employees to go to work and go home
- (2) Employee uniforms
- (3) Employee cafeterias providing three meals a day
- (4) Full attendance rewards
- (5) Sickness and funeral subsidies
- (6) Employee loans
- (7) Annual employee athletic events and parties
- (8) Senior employee citations and awards
- (9) Special treatment to pregnant employees





Continuing education and training

Good employee continuing education programs can not only enhance employees' work capacity but also help the company attract talents. From the first day employees entering the company, Apex provides complete training courses and continuing education programs to cultivate their sense of belonging and teamwork culture. Apex also encourages employees to participate in special project planning to stimulate their self-expectations and thus enhance the company's competitiveness.

Apex employee training achievements in 2018 are as follows:

Project	Hours	Amount of Training	Number of Trainees
New Employee Training	3,220	1 502 000	33,141
Professional Training	935	1,502,000	23,953
Director and Manager Training	78	28,000	21
Total	4,233	1,530,000	57,115

- 1. New employee training is internal training, and the accomplishment rates reached over 95%.
- 2. Professional Training including internal training and external training. According to type of program, it could be divided into law/regulation, quality system, quality and efficiency, attitude adjustment, leadership, others, external training, output plan, CSR and courses regulated by competent authority. The achievement rate is above 95%.
- 3. The training of directors and managers shall be conducted in accordance with the provisions of the Taiwan Decree, with a completion rate of 100%.
- 4. Retirement system and implementation. The employee retirement system is conducted in accordance with local regulations.
 - A. Thailand area: The Company provides defined benefit retirement welfare to employees by following Section 118, Chapter 11 of the Thai Labor Protection Act. Employees who are qualified for retirement could get reasonable retirement fund corresponding to service years and salary level. The Company has booked related liability according to actuarial report issued by Thai certificated actuary.
 - B. Taiwan area: Employees in Taiwan all adapt to Taiwan Labor Pension Act. The Company allocates 6% of each employee's salary to personal retirement fund under custody of Taiwan Bureau of Labor Insurance.
- 5. Protective measures for employees' rights and interests: Harmonious and pleasant workplace ambiance is an important condition for effective teamwork. To ensure smooth exchanges of ideas between the management team and employees and achievement of consensus, Apex has always regarded reasonable pay scales, decent work environments and effective communication channels as priority tasks. Apex Group adopts the following measures to communicate with employees:
 - A. CEO box: Employees can make their suggestions and problems known to the management team by using the CEO box.
 - B. Weekly meetings: Apex round up all the employees once a week to convey company policies to employees to make sure consensus is achieved and all employees move toward the same goal.
 - C. Regular convention of inter-division meetings: Apex's Employee Welfare Committee helps to protect employees' rights and interests to ensure the winwin target of mutual trust and mutual benefit between labor and management can be achieved.

The labor-management relations in Apex are harmonious. No labor-management dispute has ever happened. Apex highly values employees' welfare, pays attention to changes in the subjective and objective environments and establishes various welfare measures accordingly to satisfy the needs of employees. While we have no Trade Union in Apex operations, Apex established 2 main working committees as joined management-worker groups namely OHSAS 18001 working groups and Safety & Occupational committee (as per Thai regulation) which total a number of 272 employees joined these committees to represent 4.18% of total employees. The OHSAS 18001 committee is also responsible for establishing, implementing and maintain all OH&S regulation and practices related to Apex Operations.

Safety Committee:

	APEX 1	APEX 2
Assistant Manager level or above	28	23
Common Employees	27	22
Total	55	45

OHSAS Committee:

	APEX 1	APEX 2
Assistant Manager level or above	82	90





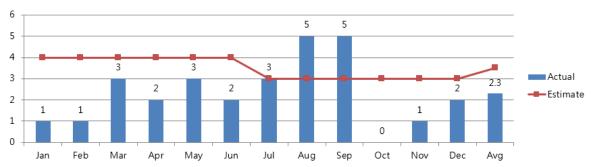




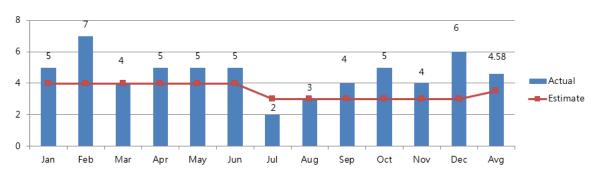
Protective measures for work environments and employees' safety

Apex has an OHSAS 18001 committee and a safety and professional committee which regularly inspects whether the work environments comply with safety regulations to minimize workplace safety hazards. Apex also regularly provides employees with physical checkups, hoping that they can be aware of their health condition and employees' physical and mental health can be improved.

Number of accident – Apex I



Number of accident - Apex II











The statistical Indicators of safety and health in FY2017 and FY2018

Statistical Indicators	Gender	FY2017	FY2018	Unit
Manking injum.	Male	55	51	Number of cases
Working injury	Female	30	32	Number of cases
Occupational hazard	Male	0	0	Number of cases
Occupational hazard	Female	0	0	Number of cases
Total working injury leave	Male	52	105	Days
Total working injury leave	Female	10	43	Days
Total absence days	Male	8,030	11,101	Days
Total absence days	Female	11,122	14,809	Days
Total working hours	Male	6,016,734	6,271,465	Hours
Total working hours	Female	8,176,307	8,471,417	Hours
Total working days	Male	2,024,630,991	2,187,173,244	Man Day
Total working days	Female	3,780,519,949	3,925,442,852	Man Day
D 11 T 11	Male	0	0	Number of people
Death Toll	Female	0	0	Number of people

Calculated	Gender	200,000 hours		Million hours	
Indicators	Gender	FY2017	FY2018	FY2017	FY2018
Inium, nata	Male	1.83	1.63	9.14	8.13
Injury rate	Female	0.73	0.76	3.67	3.78
Occupational	Male	-	-	-	-
disease rate	Female	-	-	-	-
Lost day rate	Male	13.83	26.79	69.14	133.94
	Female	1.96	8.12	9.78	40.61
Absentee rate	Male			1.07%	1.42%
Absentee rate	Female			1.09%	1.40%

Glossary and Calculation formula

- 1. Working Injury: Injured by working, including car accidents.
- 2. Occupational hazard: the worker has suffered from diseases by the working place, product, and so on.
- 3. Total Working Injury leave: the worker take the sick leave because injured by working, including car accidents.
- 4. Total absence days: Total absence days without annual leave, official leave, marriage leave, funeral leave, maternity leave and paternity leave (including sick leave, working injury leave, personal leave)
- 5. Total working hours: For daily workers is the total working hours per month, for monthly workers is the total working days*8hrs* the number of monthly workers

- Total working days: the number of working people on December 31 of the year x total working hours / 8 hours
- 7. Injury rate: total work injury (pieces) / total working hours x200,000
- Occupational disease rate: total number of occupational diseases (number of pieces) / total working hours x200,000
- 9. Lost day rate: Working Injury leave days x 8 hours / total working hours x200,000
- Absentee rate: total absence days x 8 hours / total hours worked
- 11. The coefficient of 200,000 is 50 weeks per 100 employees and 40 hours per week.
- 12. Data Source: Apex Administration

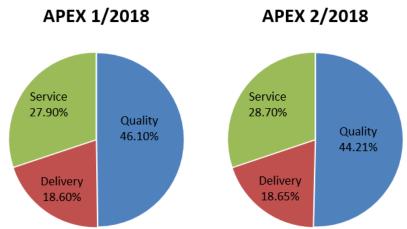
Customer Services

Apex valued customers' needs and expectation and continue to improve their satisfaction. Through customer's feedback, Apex improves internal process and has passed ISO 9001. All of these effort keeps Apex in the top supplier list - in view of customer, relationship management and business growth.

Apex has engaged with customers through the day to day operations as well as implemented customer satisfaction survey on a 6-month basis. This survey, which covers top 10 customers of Apex's PCB products, considers feedback in 3 dimensions including quality, fast delivery of products as well as services. The results of surveys were then analyzed, and reported directly to top management for Apex responsiveness to customer inquiry, and established the next year targets and improved internal and external processes.

Apex has set up a service window to handle all kinds of customer satisfaction at the earliest time and also provides customers with complete product information.

Apex's product labeling is conducted in accordance with related regulations and international standards i.e., RoHS and HF. No illegal incidents occurred in 2018.



Apex 1/2018 Satisfaction Rating: 92.60% Apex 2/2018 Satisfaction Rating: 94.50%

Note: The total score of Quality satisfaction rating, Service satisfaction rating and Delivery is 50%, 30% and 20%, respectively.

Supplier Co-operation

Apex has "Ethical Corporate Management Best Practice Principles / and its Guidelines for Conduct, which stipulates the types of unethical behaviors and improper interests and reporting channels. All of Apex's employees are required to abide by business ethics and responsibilities to the public and stakeholders. At the same time, the members of the board of directors and management all perform their duties in good faith and abide by the codes of conduct of directors and managers. They exercise strict self-discipline with caution when performing their duties. Apex's procurement department conducts supplier evaluation and audits regularly and insists that all products must comply with the RBA or ISO 14001 standards so that both sides can jointly fulfill the social responsibility of achieving quality and environmental protection at the same time.

Top 10 of Apex's suppliers have already signed the Commitment Letter to comply with the company's social responsibility policy. If the supplier is found in violation of the company's corporate social responsibility policy and result in significant impact on the environment and society, Apex may terminate or cancel the contract at any time.

General Standard Disclosures

GRI Standard Number	Disclosure Item	Page number (Link)	Note				
General Disclosures							
1. Organiza	ational Profile						
102-1	Name of the organization	Page 1					
102-2	Activities, brands, products, and services	Page 6					
102-3	Location of headquarters	Page 7					
102-4	Location of operations	Page 7					
102-5	Ownership and legal form	Page 7					
102-6	Markets served	Page 6					
102-7	Scale of the organization	Page 6					
102-8	Information on employees and other workers	Page 8					
102-9	Supply chain	No disclosure	No major changes compared to the previous year				
102-10	Significant changes to the organization and its supply chain	No disclosure	No major changes compared to the previous year				
102-11	Precautionary Principle or approach	Page 5					
102-12	External initiatives	No disclosure	No participation in external initiatives				
102-13	Membership of associations	No disclosure	Participate only in the Taiwan Circuit Board Association (TPCA)				
2. Strategy							
102-14	Statement from senior decision-maker	Page 2-3					
102-15	Key impacts, risks, and opportunities	Page 4-5, 12					
3. Ethics and integrity							
102-16	Values, principles, standards, and norms of behavior	Page 11-12					
102-17	Mechanisms for advice and concerns about ethics	Page 11-12					

GRI Standard Number	Disclosure Item	Page number (Link)	Note
4. Governance	General Di	sciosures	
102-18	Governance structure	Page 11	
102-19	Delegating authority	Page 11	
102-20	Executive-level responsibility for economic, environmental, and social topics	Page 11	
102-21	Consulting stakeholders on economic, environmental, and social topics	Page 10	
102-22	Composition of the highest governance body and its committees	No disclosure	No major changes, please refer to the second section of Directors, General Manager, Deputy General Manager, Associate, Department and Branch Directors of the Corporate Governance of Apex 2018 Annual Report.
102-23	Chair of the highest governance body	No disclosure	It is chairman
102-24	Nominating and selecting the highest governance body	Page 11	
102-25	Conflicts of interest	Page 11	
102-26	Role of highest governance body in setting purpose, values, and strategy	Page 11	
102-27	Collective knowledge of highest governance body	Page 11	
102-28	Evaluating the highest governance body's performance	Page 11	
102-29	Identifying and managing economic, environmental, and social impacts	Page 8-9	

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GRI Standard Number	Disclosure Item	Page number (Link)	Note		
General Disclosures					
4. Governa	nce (Cont'd)				
102-30	Effectiveness of risk management processes	Page 11			
102-31	Review of economic, environmental, and social topics	Page 8-9			
102-32	Highest governance body's role in sustainability reporting	Page 11			
102-33	Communicating critical concerns	Page 10			
102-34	Nature and total number of critical concerns	Page 8-9			
102-35	Remuneration policies	No disclosure			
102-36	Process for determining remuneration	No disclosure			
102-37	Stakeholders' involvement in remuneration	Page 10			
102-38	Annual total compensation ratio	No disclosure			
102-39	Percentage increase in annual total compensation ratio	No disclosure			
5. Stakeho	lder Engagement				
102-40	List of stakeholder groups	Page 10			
102-41	Collective bargaining agreements	Page 12, 16			
102-42	Identifying and selecting stakeholders	Page 10			
102-43	Approach to stakeholder engagement	Page 10			
102-44	Key topics and concerns raised	Page 10			

GRI Standard Number	Disclosure Item	Page number (Link) Disclosures	Note
6. Reporting		Disclosures	
102-45	Entities included in the consolidated financial statements	Page 7	
102-46	Defining report content and topic Boundaries	Page 1	
102-47	List of material topics	Page 8-9	
102-48	Restatements of information	No disclosure	No restatement issues
102-49	Changes in reporting	No disclosure	No restatement issues
102-50	Reporting period	Page 1	
102-51	Date of most recent report	No disclosure	December 2018
102-52	Reporting cycle	Page 1	
102-53	Contact point for questions regarding the report	Page 1	
102-54	Claims of reporting in accordance with the GRI Standards	Page 1	
102-55	GRI content index	Page 19-22	
102-56	External assurance	Page 1	

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GRI Standard Number	Disclosure Item	Page number (Link)	Note		
Material Topic					
1. Economic To	pics				
1.1 Corporate G	Governance				
103-1	Explanation of the material topic and its Boundary	Page 8-9			
103-2	The management approach and its components	Page 8-9			
103-3	Evaluation of the management approach	Page 8-9			
201-1	Direct economic value generated and distributed	Page 6			
201-2	Financial implications and other risks and opportunities due to climate change	Page 5			
201-3	Defined benefit plan obligations and other retirement plans	No disclosure	Please refer to the Apex Consolidated report footnote 6(13) "Pension" in Chapter VIIII Appendix of Apex 2018 Annual Report for details.		
201-4	Financial assistance received from government	No disclosure	Please refer to the Apex Consolidated report footnote 6(14) "Income Tax" in Chapter VIIII Appendix of Apex 2018 Annual Report for details.		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Page 9			
202-2	Proportion of senior management hired from the local community	Page 8			

GRI Standard Number	Disclosure Item	Page number (Link)	Note	
	Material Topic			
2. Environmenta	al Topics			
2.1 Water and E	ffluents			
303-1	Interactions with water as a shared resource	Page 13-14		
303-2	Management of water discharge-related impacts	Page 13-14		
303-3	Water withdrawal	Page 14		
303-4	Water discharge	Page 14		
303-5	Water consumption	Page 14		
2.2 Emissions				
305-1	Direct (Scope 1) GHG emissions	Page 13		
305-2	Energy indirect (Scope 2) GHG emissions	Page 13		
305-3	Other indirect (Scope 3) GHG emissions	Page 13		
305-4	GHG emissions intensity	Page 13		
305-5	Reduction of GHG emissions	Page 13		
2.3 Effluents and Waste				
306-1	Water discharge by quality and destination	Page 13-14		
306-2	Water discharge by quality and destination	Page 13-14		

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GRI Standard Number	Disclosure Item	Page number (Link)	Note	
	Material Topi	ic		
3. Social Topi	cs			
3.1 Occupation	onal Health and Safety			
403-1	Occupational health and safety management system	Page 17-18		
403-2	Hazard identification, risk assessment, and incident investigation	Page 17-18		
403-3	Occupational health services	Page 17-18		
403-4	Worker participation, consultation, and communication on occupational health and safety	Page 17-18		
403-5	Worker training on occupational health and safety	Page 17-18		
403-6	Promotion of worker health	Page 17-18		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 17-18		
3.2 Human Rights				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Page 19		