

台灣大哥大人權風險及盡職調查 Taiwan Mobile Due Diligence Report

*台灣大哥大實施人權減緩措施的據點數量：691（含台灣大哥大及子公司等 8 家公司，以及台灣大哥大 381 家直營店、302 家經銷據點）
Taiwan Mobile implemented the number of sites with Human Rights mitigation measures: 691 (including TWM and 7 subsidiaries, as well as 381 direct stores and 302 franchise stores).

* 今年台灣大哥大各項人權指標皆落在「影響程度高，而發生機率與脆弱度低」的象限範圍內。
2023, Taiwan Mobile’s results of the questionnaire, overall, all Human Rights indicators fall within the quadrant of "High degree of impact, but low probability of occurrence and vulnerability."

Value Chain：Own Operation

● 價值鏈上，〔所有員工〕包含正職員工及派遣員工，而盡責調查涵蓋的弱勢群體有：女性（妊娠中及分娩後未滿一年之女性員工）、殘疾人士、原住民、移民勞工。
In the value chain, [All employees] includes regular employees and dispatched employees, and the vulnerable groups covered by the due diligence are: women (female employees during pregnancy and less than one year after delivery), people with disabilities, indigenous people, and migrant workers.

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						A. % of total assessed in last three years	B. % of total assessed (column A) where risks have been identified	C. % of risk (column B) with mitigation actions taken			
G1	工作與勞動條件保障	勞動條件未循法定要求	● 若政府有修訂法令，會全面檢視公司規章制度及員工勞動條件，確保皆符合法定要求。	● 若發生不符法定要求規定之情事，立即依法定要求修正並建立查核機制，避免再次發生。	重要風險	100%	0%	-	HR	● 2023 目標:100%遵循法定要求為目標 ● 2023 達成 100% ● 2024 目標為 100%	
G1	Guarantee of Job and Labor Conditions	The company's working conditions fail to comply with statutory requirements, resulting in insufficient protection of basic work rights.	● If any labor law is revised and enacted, we will comprehensively review the company's rules/ regulations and working conditions of employees to ensure that all of them meet statutory requirements.	● If a compliance breach occurs, we will immediately revise according to statutory requirements and establish a mechanism to prevent recurrence.	Major risk	100%	0%	-	HR	● 2023 Goal 100% compliance with laws. ● 2023 Goal Achievement Rating 100% ● 2024 target is 100% compliance with laws.	
J1	人身自由與安全	在公司遭受暴力(如肢體、言詞或精神暴力)、脅迫或恐嚇等	● 為宣示公司對於工作場所因職務遭受不法侵害之重視，總經理與各單位處級主管已於 Y23 簽署「禁止工作場所不法侵害聲明」並公告。 ● 遵循法令定期執行職場不法侵害預防之危害辨識及風險評估和監測。 ● 強化教育訓練，提供不法侵害預防課程。	● 依執行職務遭受不法侵害事故處理與調查程序進行申訴案件調查。 ● 必要時提供申訴者心理輔導等資源。	重要風險	100%	0%	-	勞安	● 2024 目標：至少不超過 2023 申訴案件數。每三年進行一次風險評估和監測。	● https://corp.taiwanmobile.com/esg/safeHealthyWorkingEnvironment.html ● 勞動部公告修正「執行職務遭受不法侵害預防指引」: https://www.osha.gov.tw/48110/48417/48423/135012/

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J1	Personal Freedom and Safety	Violence(such as physical, verbal or emotional violence), coercion or intimidation in the workplace.	<ul style="list-style-type: none"> To demonstrate that the company attaches great importance to workplace violence suffered due to duties in the workplace, The general manager and division-level supervisors signed the "Declaration on Prohibiting Workplace Violence" and announced it in 2023. Comply with regulations Hazard risk identification and risk assessment monitoring for workplace violence prevention regularity. Strengthen education and training, and provide illegal infringement prevention courses. 	<ul style="list-style-type: none"> Investigate complaints according to the handling and investigation procedures for unlawful infringement incidents in the performance of duties. Provide psychological counseling resources for complainants when necessary. 	Major risk	100%	0%	-	Lab or Safety & Health	<ul style="list-style-type: none"> 2024 target: zero incidence Risk assessment and monitoring every three years. 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/esg/safeHealthyWorkingEnvironment.html https://www.osha.gov.tw/48110/48417/48423/135012/
H1	強迫勞動	未能遵循法定規範，導致工時過長造成身心影響	<ul style="list-style-type: none"> 公司出勤管理辦法明定每日正常工時、加班時數上限及加班經員工同意。 同仁申請加班，系統控管不得超出加班時數上限。 	<ul style="list-style-type: none"> 若員工反映有強迫勞動情事或工時過長，公司會查明事實並要求單位主管應恪遵勞動法令。 員工延長工時，可於事後選擇申請補休或加班費。 	重要風險	100%	0%	-	HR	<ul style="list-style-type: none"> 2023 目標:以零強迫勞動事件為目標 2023 達成 100% 2024 目標:零強迫勞動事件 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/esg/humanRights.html
H1	Forced or Compulsory Labor	The company violates laws and results in work overtime & causes physical and psychological effects.	<ul style="list-style-type: none"> The company's attendance management policy clearly defines regular working hours, maximum overtime hours and consent of an employee for overtime work. Our attendance system will control that employees shall not exceed maximum overtime hours. 	<ul style="list-style-type: none"> If there is any reported case of forced labor or work in excess of maximum overtime hours, an investigation will be carried out and supervisors will be required to make necessary improvements and comply with labor laws. If employees work overtime, they can apply compensatory leave or overtime pay. 	Major risk	100%	0%	-	HR	<ul style="list-style-type: none"> 2023 Goal: Zero forced labor. 2023 Goal Achievement Rating 100%. 2024 target is zero forced labor. 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/esg/humanRights.html

Value Chain : **Downstream (Products/services) – Customer**

● 價值鏈上，「客戶」盡責調查涵蓋所有的弱勢群體，包含：老人、兒童、殘疾人士、原住民、移民勞工...等。因為只要有合法證件，皆可成為 TWM 的客戶。
In the value chain, [customer] due diligence covers all vulnerable groups, including: elderly people, children, people with disabilities, indigenous people, migrant workers... etc. Because as long as there are legal documents, they can become TWM customers.

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A2	個資與隱私保護	未依規定蒐集、處理或利用用戶個資/隱私，導致洩漏個資/隱私且未能及時，並侵害當事人權益	<ul style="list-style-type: none">透過公正第三方檢驗個資隱私管理之有效性，如落實 ISO27001「資訊安全管理制度」、BS 10012 及 ISO/IEC 29100「隱私保護」證書持續有效，融入企業經營流程，持續改善安全機制，例如：推動資通安全維護計畫等；擴大個資管理範圍並取得國際最新隱私保護標準-ISO27701「個人資料隱私管理系統」，提升資訊隱私與安全水準。公司依據個資法蒐集用戶個資，只用於特定目的；若有特定目的外之使用，將會要求客戶簽署同意書，故客戶未同意前，不會將客戶資訊用於第二用途或提供客戶資訊予第三方。	● 若發現有個人資料與隱私侵害事件發生時，即啟動事件通報作業，由專責小組針對事件發生詳情進行瞭解並擬定應變方案。	重要風險	100%	0%	-	CBG	<ul style="list-style-type: none">2023 未有申訴件2024 目標同 2023	<ul style="list-style-type: none">https://www.taiwanmobile.com/footer/static-privacy.html
A1		未能考量用戶個資/隱私保護，並侵害當事人權益									
A3		發生客戶資料資安洩漏事件時，未能及時通報與妥善處置，導致當事人權益受損									
A2	Personal Data and Privacy Protection	Failure to collect, process or use user personal information/privacy in accordance with regulations, resulting in leakage of personal information/privacy and failure to timely, and infringing on the rights and	<ul style="list-style-type: none">By engaging an impartial third party to assess the efficacy of personal data privacy management, including the implementation of ISO 27001 "Information Security Management System," BS 10012, and ISO/IEC 29100 "Privacy Protection" certificates, and seamlessly integrating them into corporate operational processes, continuous improvement of security mechanisms becomes achievable. Initiatives, such as the promotion of information security maintenance plans, actively contribute to this overarching goal. Expanding the scope of personal data management and adhering to the latest international	<ul style="list-style-type: none">If a personal data and privacy breach is detected, the company activates an incident reporting procedure. A specialized team thoroughly investigates the details of the incident and formulates a response plan.	Major risk	100%	0%	-	CBG	<ul style="list-style-type: none">No complaint in Year 2023.The target of Year 2024 is the same as Year 2023.	<ul style="list-style-type: none">https://english.taiwanmobile.com/about/privacyPolicy.html

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		interests of the parties.	privacy protection standard, ISO 27701 "Personal Information Privacy Management System," heightens the standards of information privacy and security. <ul style="list-style-type: none"> The company collects user personal information in accordance with the Personal Data Protection Act, utilizing it exclusively for specific purposes. In the event of any utilization beyond these predefined purposes, customers will be requested to provide their consent by signing a consent form. Until customer consent is obtained, the company refrains from using customer information for secondary purposes or disclosing it to third parties. 								
A1		Failure to consider user personal information/privacy protection and infringe on the rights and interests of the parties.									
A3		In the event of information security leakage of customer data, failure to notify and properly handle it, resulting in damage to the rights and interests of the parties.									

Value Chain : Downstream (Products/services) – Local Community

- 價值鏈上，「社區」盡責調查涵蓋公司辦公大樓及各設施(機房、基站)，所在位置附近的所有群體。

In the value chain, [Community] Due diligence covers all groups in the company's office building and facilities (computer room, base station) and near the location.

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N1	社區居住品質	未依法採取防止環境污染(如空氣、水等)，或未依法對事業廢棄物採行適當之管理措施(如資源回收)	<ul style="list-style-type: none"> ● 機房所採使用之發電機排煙設備採黑煙淨化設計，避免發電時之黑煙排放。 ● 減少因不可回收廢棄物經焚化後所產生之焚化及掩埋量。 維持對社區及居民良好居住及生活品質之權益	<ul style="list-style-type: none"> ● 提供發生社區居住品質之人權危害風險的投訴管道與機制，申訴電話: 0809-000-852 / 02-66062999。專人專責快速協助客戶妥善解決問題與回應需求(詳細請參閱 ESG 報告書章節：3.1.4 溝通機制)。 	重要風險	100%	0%	-	TG	<ul style="list-style-type: none"> ● 社區及居民不因居住品質受影響而客訴。 ● 廢棄物不可回收量較基準年(2017)減少 19% 	<ul style="list-style-type: none"> ● https://corp.taiwanmobile.com/esg/environmental.html ● https://corp.taiwanmobile.com/esg/environmentalAndEnergyPolicy.html
N1	Local communities Living Quality	Failure to take measures to prevent environmental pollution in accordance with the law(e.g. air, water, etc.), or fail to take appropriate management measures for waste in accordance with the law(e.g. resource recycling).	<ul style="list-style-type: none"> ● The diesel particulate filter equipment of generators employed in the Telecom Server Rooms is designed with a soot purification system to prevent the emission of black smoke during power generation. ● Reduce the volume of incineration and landfill resulting from the incineration of non-recyclable waste. Preserve the rights to good living conditions and quality of life for the community and residents. 	<ul style="list-style-type: none"> ● Provide channels and mechanisms for complaints regarding risks of human rights harms to community living quality, with a grievance hotline: 0809-000-852 / 02-66062999. Dedicated personnel are responsible for quickly assisting customers to properly solve their issues and respond to their needs (more information please refer ESG report to Section 3.1.4 Communication Mechanism). 	Major risk	100%	0%	-	TG	<ul style="list-style-type: none"> ● The community and residents do not lodge complaints due to impacts on their living quality. ● The volume of non-recyclable waste has decreased by 19% compared to the baseline year (2017). 	<ul style="list-style-type: none"> ● https://english.taiwanmobile.com/esg/environmental.html ● https://english.taiwanmobile.com/esg/environmentalAndEnergyPolicy.html

Value Chain：Upstream – Supply Chain

● 價值鏈上，「供應商」盡責調查涵蓋的弱勢群體有：第三方雇員、兒童、原住民、移民勞工、殘疾人士
In the value chain, the vulnerable groups covered by the [supplier] due diligence are: third-party employees, children, indigenous people, migrant workers, people with disabilities

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G1	工作與勞動條件保障	未遵循法定要求，以致同仁基本工作權利(如基本薪資、法定休假、加班..等)無法被充份保障	<ul style="list-style-type: none">建議供應商制定勞動管理辦法，需完全符合「勞基法」，內容須涵蓋薪酬制度、福利制度、休假制度、加班制度，並明文規定不得低於所在國家最低勞動條件建議供應商應積極創造良好勞動條件，公司內部設立專責管理人員，負責勞動狀況以符合政府勞動法令、法規，且無勞動事件。	<ul style="list-style-type: none">要求供應商說明違規事項與原由，並提出具體改善行動上市櫃公司須有勞動爭議調查委員會每年透過 ESG 審查檢視執行現況	重要風險	100%	0%		採購	● 2024 重大供應商 0 項人權高風險	
G1	Guarantee of Job and Labor Conditions	The company failed to comply with legal requirements, resulting in basic work rights (e.g. basic salary, statutory leave, overtime, etc.) being unable to be fully protected.	<ul style="list-style-type: none">Suppliers are advised to establish labor management practices that fully comply with the [Labor Standards Act]. The content must cover the salary system, benefits system, leave system, and overtime system, and must explicitly stipulate that it shall not be less than the minimum labor conditions of the country where it is located.Suppliers are advised to recommended that suppliers actively create good labor conditions and set up dedicated managers within the company to responsible for labor conditions to comply with government labor laws and regulations, and to ensure that there are no labor incidents.	<ul style="list-style-type: none">Suppliers are required to explain violations, propose specific improvement actions.Listed companies must have a Labor Dispute Investigation Committee.Review the implementation status through ESG assessment every year.	Major risk	100%	0%		procurement	● 2024 aiming zero finding with significant suppliers with high-risk in human rights.	
N1	社區居住品質	未依法採取防止環境污染(如空氣、水等)，或未依法對事業廢棄物採行適當之管理措施(如資源回收)	<ul style="list-style-type: none">建議供應商制定環境保辦法、廢棄物管理辦法，內容須涵蓋空水廢毒等污染防治與監測措施建議供應商須依據法規申報營運範圍內產生之廢氣、廢水、廢棄物、毒化物要求供應商減少因不可回收廢棄物經焚化後所產生之焚化及掩埋量，	<ul style="list-style-type: none">要求供應商必須調查污染源，並記錄監測結果，若發現違規之行為須立即停工，並提出改善行動每年透過 ESG 審查檢視執行現況與法遵情形	重要風險	100%	0%		採購	● 2024 重大供應商皆須制訂環境保護辦法	

