

TWM 人權風險及盡職調查結果 Taiwan Mobile Due Diligence Report

Value Chain	Topic identification	Human rights risk Impact assessment	Management and Remediation	Risk level	Due diligence results			Responsible Dept.	Target setting	Information disclosure
					Survey scope (%)	problem found (%)	Processing ratio (%)			
供應商 Suppliers	● 不強迫勞動	● 違反勞工自由意志，為達經濟目的威脅基本人權	<ul style="list-style-type: none"> 於 2011 年公告「供應商企業社會責任守則」，作為供應商執行案件之規範 對供應商進行宣導與教育訓練 鼓勵供應商每年填寫 CSR 自評問卷 定期依據風險辨識結果進行供應商不同形式之訪查或稽核 每年舉辦供應商交流會，邀請績優廠商分享管理實務 <p>矯正措施：</p> <ul style="list-style-type: none"> 給予改善建議如：建議持續依據安全衛生相關認證標準進行內部作業的改善；針對工作場所進行危險源有效識別、標示、改善；規劃安全衛生教育訓練主題，並定期執行訓練等。 將於隔年度進行高風險供應商複查。 	次要風險	85.94 %	0.46%	100 % 註	採購	<ul style="list-style-type: none"> 2020 年前完成對 80% 的關鍵一階供應商風險評估 	<ul style="list-style-type: none"> 供應商企業社會責任守則 承攬商衛生安全環保規章 廠商申訴辦法 https://twmepmall.taiwanmobile.com/esp/
	● 同工同酬	● 不平等與潛在職場歧視								
	● 不聘用童工	● 妨礙兒童身心發展								
	● 聘僱流程不歧視	<ul style="list-style-type: none"> 聘僱過程歧視違反平等對待原則 不平等造成潛在對立 								
	● 勞資協商機制訂定	● 勞資關係不平等，員工話語權低落，潛在壓榨勞工人權								
	● 保障職業安全衛生	● 危險工作環境威脅勞工人身安全								
	● No forced labor	● Violation of worker's free will which threatens their basic human rights	<ul style="list-style-type: none"> Announced the "Supplier CSR Code of Conduct" in 2011 as a CSR guideline for suppliers Held CSR training sessions for suppliers Suppliers completes the CSR self-assessment questionnaire every year on-site visits or audits of suppliers based on risk identification results Holds supplier CSR conference every year, inviting front-runners to share their practices <p>Remediation</p> <ul style="list-style-type: none"> Suggestions for improvement such as: It is recommended to continue to improve internal operations based on safety and health related certification standards; to effectively identify, label, and improve hazard sources in the workplace; to plan safety and health education and training topics, and to perform regular training, etc. 	secondary risk	85.94 %	0.46%	100%	Purchasing Dep.	<ul style="list-style-type: none"> Conduct risk assessment for 80% of our critical tier-1 suppliers 	<ul style="list-style-type: none"> Taiwan Mobile CSR Guidelines for suppliers TWM Contractors Health and Safety Commitment Guidelines for vendor appeal https://twmepmall.taiwanmobile.com/esp/
	● Wage equality	● Inequality and potential workplace discrimination								
	● No child labor	● Impediment of children's physical and mental development								
	● Non-discrimination	● Inequality in recruitment and employment								
	● collective bargaining Mechanism	● Inequality in labor relations								

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	<ul style="list-style-type: none"> Occupational safety and health 	<ul style="list-style-type: none"> Dangerous work environment threatens labor safety 	<ul style="list-style-type: none"> High-risk supplier will be reviewed in the following year 							
所有員工 All Employees	<ul style="list-style-type: none"> 不聘用童工 	<ul style="list-style-type: none"> 工作環境妨礙童工健康 	<ul style="list-style-type: none"> 面談時，請應徵者填寫公司履歷表載明其出生年，且本人簽署保證所填寫資料屬實 員工於到職當日，須繳驗個人身分證，查驗資料是否屬實 	重要風險	100%	0%	--	HR	<ul style="list-style-type: none"> 零童工聘用 Y18 達成率 100%，Y19 目標同 Y18 	https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html
	<ul style="list-style-type: none"> Abolish child labor 	<ul style="list-style-type: none"> The working conditions are injurious to the health of child labor 	<ul style="list-style-type: none"> Candidates are required to fill in their year of birth on application forms and sign to certify that all information stated in the resume is true before the interview. During onboarding, new employees must provide valid identification documents to certify the information. 	major risk	100%	0%	--	HR	<ul style="list-style-type: none"> Y18 Goal : Zero child labor Y18 Goal Achievement Rating : 100% Y19 Goal : Zero child labor 	https://english.taiwanmobile.com/csr/employeeStructure.html
	<ul style="list-style-type: none"> 聘用身障 	<ul style="list-style-type: none"> 就業機會不平等 工作環境讓身障者感受不友善 	<ul style="list-style-type: none"> 重新設計職務，提供身障人員工作 與外部進用身障人員機構合作，提供工作機會 建立對身障人員友善、無障礙之軟硬體工作環境 優先保留固定且安全進出的車位予身障同仁 	次要風險	100%	0%	--	HR 勞安	<ul style="list-style-type: none"> 符合法令足額進用身障人員 零傷害 Y18 達成率 100%，Y19 目標同 Y18 	https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html
	<ul style="list-style-type: none"> Employment of people with disabilities 	<ul style="list-style-type: none"> Unequal employment opportunity Working conditions are unfriendly to people with disabilities 	<ul style="list-style-type: none"> Jobs were redesigned to provide employment opportunities for people with disabilities. Collaborate with external organizations that assist people with disabilities for job searching, and offer job opportunities. Create a friendly and barrier free working environment Reserve specific and safe parking spaces for disabled employees. 	secondary risk	100%	0%	--	HR 勞安	<ul style="list-style-type: none"> Y18 Goal : Hire disabled employees to meet the quota required by Taiwan law. Y18 Goal : No harm. Y18 Goal Achievement Rating : 100% Y19 Goal : Zero child labor 	https://english.taiwanmobile.com/csr/employeeStructure.html
	<ul style="list-style-type: none"> 不歧視 免於騷擾 	<ul style="list-style-type: none"> 歧視、騷擾的工作環境 	<ul style="list-style-type: none"> 職缺為公開招聘，不因性別、年齡、婚姻、種族、身心障礙而在薪酬、福利、升遷、調薪、任期、教育訓練、工作條件及就業權益等予以差別待遇 	重要風險	100%	0%	--	HR	<ul style="list-style-type: none"> 依據應徵者專長及學經歷進用及發薪，無 	https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html

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			<ul style="list-style-type: none"> 工作規則明訂，對員工不得以性別、性傾向、婚姻、種族、身心障礙等為由，予以歧視 確實遵循相關法令，制訂工作場所性騷擾防治措施、申訴及懲戒作業準則，並設置性騷擾申訴專線及信箱，公告內外部人員周知。性騷擾防治列入新訓教材及開辦全員訓練，透過多種途徑積極宣導並提醒主管與員工共同維護性別平等、友善且無歧視的工作環境 <p>性騷擾矯正措施：</p> <ul style="list-style-type: none"> 若發生性騷擾申訴案件，依相關法令規範執行糾正、懲處及施行後續補救、防治等措施。 					<ul style="list-style-type: none"> 性別差異 每年開辦兩堂不歧視或性騷擾防治相關之學習主題 Y18 達成率 100%，Y19 目標同 Y18 	responsibility/competitiveRemuneration.html	
	<ul style="list-style-type: none"> No Discrimination No harassment 	<ul style="list-style-type: none"> Discriminatory and harassing Workplace 	<ul style="list-style-type: none"> Our job vacancies are filled through a public recruiting process. Employee remuneration, benefits, promotions, raises, terms, training, working conditions or employment rights are not affected by gender, age, marital status, race or disability. There is no discrimination to employees on the basis of gender, sexual preference, marital status, race or disability, and the aforementioned principle is defined in the work rules. In compliance with the laws, we conduct workplace sexual harassment prevention measures, complaints and disciplinary rules. Sexual harassment hotline and mailbox have been included into the training materials for new employees and all employees, and posted on the internal website, and the Company website to improve the awareness. We provide a variety of avenues to educate and continuous remind employees and supervisors on safeguarding a gender equality, friendly and non-discriminatory working environment. <p>Remedial Action for Sexual Harassment</p> <ul style="list-style-type: none"> When a sexual harassment complaint arises, rectification and punishment shall be taken in accordance with regulations. Proper remedial and preventive measures should be instituted subsequently. 	major risk	100%	0%	--	HR	<ul style="list-style-type: none"> Y18 Goal : Evaluate candidates compensation based on their expertise, education, and career experiences. Under no circumstances will compensation be determined based on gender differences. Y18 Goal : Provide two training programs for no discrimination or sexual harassment prevention every year. Y18 Goal Achievement Rating : 100% 	https://english.taiwanmobile.com/csr/competitiveRemuneration.html

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	● 身心安全	● 執行職務遭受不法侵害防治措施 ● 延長工時	● 公告禁止工作場所職場暴力聲明 ● 執行職場不法侵害預防之危害辨識及風險評估和監測 ● 訂定執行職務遭受不法侵害事故處理與調查程序 ● 主管要求員工延長工時需經員工同意，且員工於事後，可選擇申請補休、或加班費 延長工時矯正措施： ● 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%	--	勞安 HR	● Y19 Goal : Same as the goal of Y18. ● y18 執行職務遭受不法侵害申訴 0 件 ● y19 目標：零發生率 ● 每三年進行一次風險評估和監測。 ● Y19 目標:加班符合法令	http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html
	● Physical and mental safety	● The workplace unlawful infringement prevention ● Work overtime	● Announcement prohibit workplace unlawful infringement Statement ● The identification and risk assessment and monitoring of the implementation of the workplace unlawful infringement prevention ● Set up workplace unlawful infringement handling and investigation procedures ● If the supervisor requests an employee to work overtime, the supervisor should get the employee's approval for overtime. If employees work overtime, they can apply compensatory leave or overtime pay. Remedial Action for Sexual Harassment : If employees work overtime, they can apply compensatory leave or overtime pay	Major risk	100%	0%	--	Occupational Safety & Health Office / Technology group	● Y18 has 0 cases of unlawful infringement handling and investigation ● Y19 goal: zero incidence ● Conduct risk assessment and monitoring every three years ● Y19 Goal:Overtime shall comply with laws.	● http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html ● https://english.taiwanmobile.com/csr/humanRights.html
	● 女性員工職場危害辨識	● 妊娠中及分娩後未滿一年之女性員工工作場所環境危害辨識與評估	● 訂定母性健康保護計畫 ● 提供懷孕與產後衛生教育資訊 ● 依評估結果區分風險等級，進行分級管理措施 ● 員工於請假系統申請"產檢假"，勞安室即主動關懷及辨識評估，妊娠中及分娩後之女性員工	次要風險	100%	0%	--	勞安	● y18 風險評估結果皆列為第一級：經醫師評估無害母體、胎兒或嬰兒健康 ● y19 目標：風險評估結果皆列為第一級	● http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html
	● Identification of female	● Women 's Workplace	● Set a maternal health protection plan	Secondary	100%	0%	--	Occupation	● Y18 risk assessment	● https://corp.taiwanmobile.com/s

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	employees' workplace hazards	Environmental Hazard Assessment in Pregnancy and Less than One Year after Childbirth	<ul style="list-style-type: none"> Provide pregnancy and postpartum health education According to the risk assessment results to distinguish the risk level, the classification management measures Employees in the leave of the system to apply for production leave, the Occupational Safety & Health Office is initiative care and assessment, pregnancy and after delivery of female employees 	risk				Occupational Safety & Health Office / Technology group	<ul style="list-style-type: none"> results are classified as level 1: physician assessment of harmless maternal, fetal or infant health Y19 goal: risk assessment results are listed as the first level 	social-responsibility/safeHealthyWorkingEnvironment.html
	<ul style="list-style-type: none"> 資訊安全及客戶個資保護 	<ul style="list-style-type: none"> 用戶客訴 員工申訴 被不當利用 	<ul style="list-style-type: none"> 已導入 ISO/IEC 27001 / 27011 / 27018、PCIDSS、BS10012、ISO29100 認證 持續規劃導入隱私保護系列國際標準，強化客戶隱私保護水平。 舉行個資/資訊安全委員會議，檢討、推動個資/資安防護。 推動個資/資安內稽、外稽作業，並於委員會呈報執行結果 資訊安全年度訓練(全員) 供應商 SCMS 平台登入帳號、密碼及 Token 管理 	重要風險	100%	0%	--	資安	<ul style="list-style-type: none"> 每年四次稽核，持續通過認證 每年資安內稽二次、外稽二次 100%完訓、通過考試 以零洩漏為目標 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/csr/humanRights.html
	<ul style="list-style-type: none"> Information Security and Customer Data Protection 	<ul style="list-style-type: none"> Customer complaints Employee complaints improper use 	<ul style="list-style-type: none"> Passed ISO/IEC 27001 / 27011 / 27018, PCIDSS、BS10012、ISO29100 certification Continue to plan and introduce international standards for privacy protection series to strengthen customer privacy protection Hold Personal Data and Information Security committee meeting to review and promote Personal Data / Information Security protection Promote internal/external auditing related to Personal Data / Information Security protection, and report implementation results to the committee Information Security Annual Training (all employees) SCMS supplier login account, password and token management 	Major risk	100%	0%	--	ISMS	<ul style="list-style-type: none"> 4 audits per year and continuous certification Twice internal/external audit annually 100% finished training and passing the exam Target zero leakage 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/csr/humanRights.html

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營運 - 工務	● 勞工安全	● 工安事件影響人員生命財產安全。	<ul style="list-style-type: none"> ● 人員安全措施： <ul style="list-style-type: none"> ➢ 依健康檢查結果資訊判斷是否適合派認之工作性質 ➢ 訂定工安準則供員工遵循。 ➢ 採買防護工具/偵測儀器供員工使用。 ➢ 每年辦理相關作業人員安全教育訓練等。 ● 承攬商安全管理： <ul style="list-style-type: none"> ➢ 制訂承攬商安全衛生管理作業程序供廠商施工遵循 ➢ 辦理施工前會議，並進行危害告知。 ● 要求強制投保工程綜合險，以保障施工人員安全保障 	重要風險：人身安全	100%	0.002 % (2018 委外派工總數：88,851 筆 承攬商工傷 2 件)	100%	勞安 /TG	● y19 以零事件為目標	● TWM 內網/職安專區/職安規章
	● Labor Safety	● Occupational Safety Incident Affects Life and Property Safety。	<ul style="list-style-type: none"> ● Staff safety measures： <ul style="list-style-type: none"> ➢ Judging the suitability of the nature of the work according to the results of the health checkup。 ➢ Sets work safety guidelines for employees to follow。 ➢ Buy protective tools/detection equipment for employees。 ➢ Annually handle related personnel safety education training。 ● Contractor Labour Safety Management： <ul style="list-style-type: none"> ➢ Formulate contractor safety and hygiene management procedures for manufacturers to follow ➢ Conduct pre-construction meetings and inform hazards。 ➢ Requires compulsory insurance for project comprehensive insurance to protect the safety of construction workers。 	Major risk：Personal safety	100%	0.002 % (Total number of assignments for 2018：88,851 Total number of Contractor's accident at work：2)	100%	Labor Safety /Technical Group	● 2019 target is 0	● TWM intranet/Occupational Safety Zone / Occupational safety regulations
	<ul style="list-style-type: none"> ● 消防安全 ● 設備安全 	<ul style="list-style-type: none"> ● 影響員工安全 ● 維運搶修的效率及品質，影響客戶通訊權益。 	<ul style="list-style-type: none"> ● 機房內遵守消防法規之規定，建立自動消防系統、逃生安全通道及指示路線燈號 ● 定期實施安全檢查及維護保養。 	重要風險：人身安全	100%	0%	--	TG	● y19 以零異常為目標	<ul style="list-style-type: none"> ● TWM 內網/技術群/主機房設備規範 ● TWM 內網/工作規則

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	<ul style="list-style-type: none"> ● Fire Safety ● Equipment safety 	<ul style="list-style-type: none"> ● Affect employee safety ● The efficiency and quality of UMG's repairs affect the rights and interests of customers. 	<ul style="list-style-type: none"> ● Compliance with fire regulations in the computer room, establishment of an automatic fire protection system, escape safety passages, and indication of route signals ● Perform safety inspections and maintenance on a regular basis. 	Major risk : Personal safety	100%	0%	--	Technical Group	<ul style="list-style-type: none"> ● 2019 target is 0 	<ul style="list-style-type: none"> ● TWM intranet/ Technical Group / Host room equipment specification ● TWM intranet / Work rules
營運 - 資訊	<ul style="list-style-type: none"> ● 客戶個資保護 	<ul style="list-style-type: none"> ● 用戶客訴被不當利用 	<ul style="list-style-type: none"> ● 依照公司個資保護及資安規範執行，並定期接受內、外部稽核作業。 ● 實體安全管理，定期檢視相關紀錄，並提報相關執行結果。 ● 流程安全管理，定期檢視相關紀錄，並提報相關執行結果。 ● 個人安全作業規範，定期檢視相關紀錄，並提報相關執行結果。 	重要風險	100%	0%	--	IT	<ul style="list-style-type: none"> ● y19 客戶個資，以零洩漏為目標 	<ul style="list-style-type: none"> ● 通訊品質反映 http://www.taiwanmobile.com/cs/public/qualityNoticeAction.do?method=enterPage
	<ul style="list-style-type: none"> ● Customer Identity Protection 	<ul style="list-style-type: none"> ● Customer Complaint Identity Theft 	<ul style="list-style-type: none"> ● Comply with the company's PII (personally identifiable information) protection and safety standards, and perform regular internal and external audits. ● Physical security management -- review logs regularly and report relevant execution results. ● Process safety management -- review logs regularly and report relevant execution results. ● Personal safety compliance -- review logs regularly and report relevant execution results. 	Major risk	100%	0%	--	IT	<ul style="list-style-type: none"> ● Y19 Target, zero leakage 	<ul style="list-style-type: none"> ● http://www.taiwanmobile.com/cs/public/qualityNoticeAction.do?method=enterPage
營運 -	<ul style="list-style-type: none"> ● @行銷方案規劃 ● 客戶個資保護 	<ul style="list-style-type: none"> ● 洩漏個資讓讓用戶暴露在人身財產風險中 	<ul style="list-style-type: none"> ● 任何客戶個人資料於行銷運用上，會遮蔽機敏資料，若活動執行需揭露部分個人訊息，也會經過用戶簽名同意始執行。 	重要風險	100%	0.0005%	100% (機關客訴妥處比例)	行銷	<ul style="list-style-type: none"> ● 合約爭議與客訴，y19 目標同 y18 為 0.003% 	<ul style="list-style-type: none"> ● https://www.taiwanmobile.com/footer/static-privacy.html ● https://www.taiwanmobile.com/cso/online/download/download.html

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業務 / 客服	<ul style="list-style-type: none"> Marketing plan Customer Personal Data Protection 	<ul style="list-style-type: none"> Leaking Personal Data will expose Customer to personal property risks 	<ul style="list-style-type: none"> Any customer's personal data used in marketing, will cover sensitive information. If the activity is implemented, some personal information needs to be disclosed, It will also be executed by the user's signature. 	Major Risk	100%	1 萬用戶) 0.0005% (NCC contract disputes / number of active users) (33 cases in 2018 / 7.071 million users)	100% (Customer complaints properly handled ratio)	Marketing	<ul style="list-style-type: none"> Contract disputes and customer complaints, y19 target is y18 with 0.003% 	<ul style="list-style-type: none"> https://www.taiwanmobile.com/footer/static-privacy.html https://www.taiwanmobile.com/cs/online/download/download.html
	<ul style="list-style-type: none"> 銷售過程 & 售後服務 客戶個資保護 	<ul style="list-style-type: none"> 客戶資料被不當洩漏，影響客戶權益 	<ul style="list-style-type: none"> 檢核證件規範：門市受理各項業務，一律須檢核「雙證件正本」，以確保客戶資料安全。 提供無紙化作業系統：用戶於門市申辦時，服務人員需將檢附之證件掃描至系統，由系統列印合約交付給用戶，降低紙本申請書傳遞及保存風險。如遇證件格式無法掃描，服務人員以紙本進行申裝，相關證件均加蓋「限辦章」，絕不洩漏作其他用途，以確保客戶個資安全。 門市必須陳列「個人資料告知事項」，明確告知客戶個資安全使用範圍，包含個人資料搜集、處理及利用等。 保護個資規範：門市不可將客戶申裝書或客戶資料(如帳單，身分證影本，戶籍謄本等)堆放在櫃檯上或中島上。 每年推動與通過 SGS 服務驗證，透過第三方驗證機構，確保門市遵行客戶個資保護作業規範。 	重要風險	100%	0%	--	CSMO	<ul style="list-style-type: none"> Y18 未有不當洩漏之發生。 y19 目標以客戶個資「零外流」。 	<ul style="list-style-type: none"> https://corp.taiwanmobile.com/social-responsibility/personalDataProtection.html

Value Chain	Topic identification	Human rights risk Impact assessment	Management and Remediation	Risk level	Due diligence results			Responsible Dept.	Target setting	Information disclosure
					Survey scope (%)	problem found (%)	Processing ratio (%)			
	<ul style="list-style-type: none"> @Sales process & Post-sales service Customer Personal Data Protection 	<ul style="list-style-type: none"> If customers' personal data are improperly leaked, it will affect customer rights. 	<ul style="list-style-type: none"> The standard of document verification: The store sales must check the applicant's "duel ID" to secure customer data. Paperless operation system: In the application process, the service personnel needs to scan customer IDs to the system, and the system prints the contract for delivery to the customer, reducing the risk of paper-based application delivery and preservation. In the case that the ID format cannot be scanned, the service personnel process the application in paper format. All relevant documents will be stamped with "Limited Chapters" and will not be revealed for other purposes to ensure the safety of customer data. The store must display "The Notification of Personal Data Usage" to clearly inform customers of the scope of safe use of personal data, including personal data collection, processing, and utilization. The Standard of Customer Personal Data Protection: The store service personnel can not stack customer application or customer data (such as bills, ID cards, family register, etc.) on counters or display tables. Promote and pass SGS service verification every year, through SGS third-party verification, to ensure that the store complies with customer protection practices. 	Major Risk	100%	0%	--	CSMO	<ul style="list-style-type: none"> 2018 No accidental data leakage occurred 2019 target to have Zero Incidence of customer personal data leakage 	<ul style="list-style-type: none"> https://www.taiwanmobile.com/footer/static-privacy.html https://www.taiwanmobile.com/cs online/download/download.html https://corp.taiwanmobile.com/social-responsibility/personalDataProtection.html