

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

Value Chain	Item	Topic identification	Human rights risk Impact assessment	Mitigation and Remediation Plan (All the mitigation and remediation plan are applicable to the corresponding sites/department/branches/suppliers)	Risk level	Due diligence results			Responsible Dept.	Target setting	Information disclosure
						Survey scope (%)	problem found (%)	Processing ratio (%)			
所有 All	A1	● 資訊安全及客戶個人資料保護	● 客戶或員工個資被不當利用	<ul style="list-style-type: none"> <li>● 已導入 ISO/IEC 27001 / 27011 / 27018、PCIDSS、BS10012、ISO29100 認證</li> <li>● 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。</li> <li>● 舉行個資/資訊安全委員會議，檢討、推動個資/資安防護。</li> <li>● 推動個資/資安內稽、外稽作業，並於委員會呈報執行結果</li> <li>● 資訊安全年度訓練(全員)</li> <li>● 依上述稽核、會議的結果，持續優化防護措施。</li> <li>● 供應商 SCMS 平台登入帳號、密碼及 Token 管理</li> </ul> <p>● 本項問題的定義，是確實有個資洩漏，並依法向目的事業主關機關回報的件數。y19 無發生。</p> <p>矯正措施：</p> <ul style="list-style-type: none"> <li>● y19 並未發生資安和個資洩漏事件，惟資安與個資保護已是企業須高度關注的風險管理議題，且駭客手法不斷翻新，故仍列為高風險，持續關注並改善。</li> <li>● 當發生事件時，須依照資安管理辦法通報並進入改善程序，且須提報資訊安全委員會確認改善有效性。並作為內部改善作業宣導教案，持續宣導。</li> </ul>	重要風險	100%	0%	--	資安	<ul style="list-style-type: none"> <li>● 每年四次稽核，持續通過認證</li> <li>● 每年資安內稽二次、外稽二次</li> <li>● 100%完訓、通過考試</li> <li>● 以零洩漏為目標</li> </ul>	● <a href="https://english.taiwanmobile.com/csr/humanRights.html">https://english.taiwanmobile.com/csr/humanRights.html</a>
	A1	● Information Security and Customer Personal data Protection	● Improper use of personal resources of customers or employees	<ul style="list-style-type: none"> <li>● Passed ISO/IEC 27001 / 27011 / 27018, PCIDSS、BS10012、ISO29100 certification</li> <li>● Continue to plan and introduce international standards for privacy protection series to strengthen customer privacy protection</li> <li>● Hold Personal Data and Information Security committee meeting to review and promote Personal Data / Information Security protection</li> <li>● Promote internal/external auditing related to Personal Data / Information Security protection, and report implementation results to the committee</li> <li>● Information Security Annual Training (all employees)</li> <li>● Continue to optimize protective measures based on the results of the above audits and meetings.</li> <li>● SCMS supplier login account, password and token management</li> </ul> <p>● The definition of this question is the number of leaks that are</p>	Major risk	100%	0%	--	ISMS	<ul style="list-style-type: none"> <li>● 4 audits per year and continuous certification</li> <li>● Twice internal/external audit annually</li> <li>● 100% finished training and passing the exam</li> <li>● Target zero leakage</li> </ul>	● <a href="https://english.taiwanmobile.com/csr/humanRights.html">https://english.taiwanmobile.com/csr/humanRights.html</a>

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				indeed leaked and reported to the target business agency in accordance with the law. y19 nothing happened.  <b>Remediation :</b> <ul style="list-style-type: none"> <li>No information security and personal information leakage incidents occurred in y19. However, information security and personal information protection are risk management issues that companies must pay close attention to, and hacking methods are constantly being renovated, so We are still classified as high risks. Continue to pay attention and improve.</li> <li>When an incident occurs, it must be notified in accordance with the information security management method and entered into the improvement process, and it must be reported to the Information Security Committee to confirm the effectiveness of the improvement. And as an internal improvement work propaganda teaching plan, continuous propaganda.</li> </ul>							

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供應商 Suppliers	<ul style="list-style-type: none"> <li>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</li> <li>In the value chain, the vulnerable groups covered by the [supplier] due diligence are: third-party employees, children, indigenous people, immigrant workers, people with disabilities</li> </ul>											
	S1	● 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"> <li>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</li> <li>對供應商進行宣導與教育訓練</li> <li>要求供應商每年填寫 CSR 自評問卷</li> <li>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</li> <li>每年舉辦供應商交流會，邀請績優廠商分享管理實務</li> </ul>	重要風險	89.32 %	0.28 %	100%	採購	● 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"> <li>供應商企業社會責任守則</li> <li>承攬商衛生安全環保規章</li> <li>廠商申訴辦法 <a href="https://twmepmail.taiwanmobile.com/esp/">https://twmepmail.taiwanmobile.com/esp/</a></li> </ul>	
	S2	● 同工同酬	● 不平等與潛在職場歧視	<ul style="list-style-type: none"> <li>制定承攬商安全衛生環保管理標準作業程序，明定承攬安全工作要求，及進行作業前危害告知，並不定期進行安全稽查。</li> <li>對於發生的案例，給予改善方案，並要求供應商配合執行。改善方案包括： <ul style="list-style-type: none"> <li>持續依據安全衛生相關認證標準，優化內部作業，並規劃訓練主題，定期執行訓練等。</li> </ul> </li> </ul>								
	S3	● 不聘用童工	● 妨礙兒童身心發展									
	S4	● 聘僱流程不歧視	● 聘僱過程歧視違反平等對待原則									



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	S6	● Occupational safety and health	● Dangerous work environment threatens labor safety								

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所有員工 All Employees	<ul style="list-style-type: none"> <li>價值鏈上，[所有員工] 盡責調查涵蓋的弱勢群體有：兒童、殘疾人士、原住民、移民勞工、妊娠中及分娩後未滿一年之女性員工</li> <li>In the value chain, the vulnerable groups covered by the [all employees] due diligence survey include: children, people with disabilities, indigenous people, immigrant workers, female employees during pregnancy and less than one year after delivery.</li> </ul>										
	E1	● 不聘用童工	● 工作環境妨礙童工健康	● 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	次要風險	100%	0%	--	HR	● 零童工聘用 Y19 達成率 100%，Y20 目標同 Y19	<a href="https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html">https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html</a>
	E1	● Abolish child labor	● The working conditions are injurious to the health of child labor	● 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.	secondary risk	100%	0%	--	HR	● Y19 Goal : Zero child labor ● Y19 Goal Achievement Rating : 100% ● Y20 Goal : Zero child labor	<a href="https://english.taiwanmobile.com/csr/employeeStructure.html">https://english.taiwanmobile.com/csr/employeeStructure.html</a>
	E2	● 聘用身障	● 就業機會不平等 ● 工作環境讓身障者感受不友善	● 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	● 符合法令足額進用身障人員 ● 零傷害 ● Y19 達成率 100%，Y20 目標同 Y19	<a href="https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html">https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html</a>
	E2	● Employment of people with disability	● Unequal employment opportunity ● Working	● 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	secondary risk	100%	0%	--	HR 勞安	● Y19 Goal : Meet mandatory disability employment quota. ● Y19 Goal : No harm. ● Y19 Goal Achievement Rating : 100%	<a href="https://english.taiwanmobile.com/csr/employeeStructure.html">https://english.taiwanmobile.com/csr/employeeStructure.html</a>

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		ties	conditions are unfriendly to people with disabilities	employees.						<ul style="list-style-type: none"> <li>Y20 Goal : Same as the goal of Y19.</li> </ul>	
	E3	<ul style="list-style-type: none"> <li>不歧視</li> <li>免於騷擾</li> </ul>	<ul style="list-style-type: none"> <li>歧視、騷擾的工作環境</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>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</li> </ul> <p>性騷擾矯正措施：</p> <ul style="list-style-type: none"> <li>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。</li> </ul>	次要風險	100%	0%	--	HR	<ul style="list-style-type: none"> <li>依據應徵者專長及學經歷進用及敘薪，無性別差異</li> <li>每年開辦兩堂不歧視或性騷擾防治相關之學習主題</li> <li>Y19 達成率 100%，Y20 目標同 Y19</li> </ul>	<a href="https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html">https://corp.taiwanmobile.com/social-responsibility/employeeStructure.html</a> <a href="https://corp.taiwanmobile.com/social-responsibility/careerDevelopmentTraining.html">https://corp.taiwanmobile.com/social-responsibility/careerDevelopmentTraining.html</a>
	E3	<ul style="list-style-type: none"> <li>No Discrimination</li> <li>No harassment</li> </ul>	<ul style="list-style-type: none"> <li>Discriminatory and harassing Workplace</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>We provide a variety of avenues to educate and continuously remind employees and supervisors on safeguarding a gender equality, friendly and non-discriminatory working environment.</li> </ul> <p>Remedial Action for Sexual Harassment</p> <ul style="list-style-type: none"> <li>When a sexual harassment complaint arises, rectification and punishment shall be taken in accordance with</li> </ul>	secondary risk	100%	0%	--	HR	<ul style="list-style-type: none"> <li>Y19 Goal : Evaluate candidates compensation based on their expertise, education, and career experiences. Under no circumstances will compensation be determined based on gender differences.</li> <li>Y19 Goal : Provide two training programs for no discrimination or sexual harassment prevention every year.</li> <li>Y19 Goal Achievement Rating : 100%</li> <li>Y20 Goal : Same as the goal of Y19.</li> </ul>	<a href="https://english.taiwanmobile.com/csr/competitiveRemuneration.html">https://english.taiwanmobile.com/csr/competitiveRemuneration.html</a>

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				regulations. Proper remedial and preventive measures should be instituted subsequently.							
	E4	● 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	次要風險	100%	0.02 %  HR 提供正職人員共 5,749 人	100%	勞安 HR	● y19 執行職務遭受不法侵害申訴 1 件 ● y20 目標：零發生率 ● 每三年進行一次風險評估和監測 ● Y20 目標:加班符合法令	<a href="http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html">http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html</a>
	E4	● 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 Overtime : If employees work overtime, they can apply compensatory leave or overtime pay	secondary risk	100%	0.02 %	100%	Occupational Safety & Health Office / HR	● Y19 has 1 cases of unlawful infringement handling and investigation ● Y20 goal: zero incidence ● Conduct risk assessment and monitoring every three years ● Y20 Goal:Overtime shall comply with laws.	● <a href="http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html">http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html</a> ● <a href="https://english.taiwanmobile.com/csr/humanRights.html">https://english.taiwanmobile.com/csr/humanRights.html</a>
	E5	● 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	● Y19 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 ● Y20 目標：風險評估結果皆列為第一級	● <a href="http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html">http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.html</a>
	E5	● Identification of female employees' workpl	● Women's Workplace Environmental Hazard Assessment in	● Set a maternal health protection plan ● 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	Secondary risk	100%	0%	--	Occupational Safety & Health	● Y19 risk assessment results are classified as level 1: physician assessment of harmless maternal, fetal or infant health ● Y20 goal: risk	● <a href="https://corp.taiwanmobile.com/social-responsibility/safeHealthyWorkingEnvironment.html">https://corp.taiwanmobile.com/social-responsibility/safeHealthyWorkingEnvironment.html</a>

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		accident hazards	Pregnancy and Less than One Year after Childbirth	care and assessment, pregnancy and after delivery of female employees					Office	assessment results are listed as the first level	
E6	● 勞工安全	● 工安事件影響人員生命財產安全。	<p><b>人員安全措施：</b></p> <ul style="list-style-type: none"> <li>● 依健康檢查結果資訊判斷是否適合派認之工作性質</li> <li>● 訂定工安準則供員工遵循。</li> <li>● 採買防護工具/偵測儀器供員工使用。</li> <li>● 每年辦理相關作業人員安全教育訓練等。</li> <li>● 施工案件落實<u>作業危害告知</u>，及施工前的安全說明會。</li> </ul> <p><b>承攬商安全管理：</b></p> <ul style="list-style-type: none"> <li>● 制訂承攬商安全衛生管理作業程序供廠商施工遵循</li> <li>● 辦理施工前會議，並進行危害告知。</li> <li>● 要求強制投保工程綜合險，以保障施工人員安全保障</li> </ul> <p><b>矯正措施：</b></p> <ul style="list-style-type: none"> <li>● y19 無工安事件發生。因除了平日的訓練，更落實施工前的安全說明會，提升人員的工安意識。</li> <li>● 若發生職安事件，須依職業災害事故與調查管理程序，進行要因調查及改善措施擬定，並於每季職業安全衛生委員會中進行討論及宣導。</li> </ul>	重要風險	100%	0.0%	100%	勞安/TG	● Y20 以零事件為目標	● TWM 內網/職安專區/職安規章	
E6	Labor Safety	Occupational Safety Incident Affects Life and Property Safety。	<p><b>Staff safety measures :</b></p> <ul style="list-style-type: none"> <li>● Judging whether it is suitable for the nature of work assigned by the health check result information</li> <li>● Establish work safety standards for employees to follow.</li> <li>● Purchase protective tools/detection equipment for employees to use.</li> <li>● Provide safety education and training for relevant operators every year.</li> <li>● Implementation of operation hazard notification in construction cases, and safety briefing before construction.</li> </ul> <p><b>Contractor Labour Safety Management :</b></p> <ul style="list-style-type: none"> <li>● Develop contractor safety and health management operating procedures for manufacturers to follow</li> <li>● Handle pre-construction meetings and notify of hazards.</li> <li>● Compulsory insuring project comprehensive insurance is required to ensure the safety of construction personnel</li> </ul> <p>Remediation</p>	Major risk	100%	0.0%	100%	Labor Safety / Technical Group	2020 target is 0	TWM intranet/ Occupational Safety Zone / Occupational safety regulations	

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						Survey scope (%)	problem found (%)	Processing ratio (%)			
				<ul style="list-style-type: none"> <li>No work safety incident occurred on y19. In addition to training on workdays, safety briefings before construction have been implemented to enhance workers' awareness of work safety.</li> <li>In the event of an occupational safety incident, it is necessary to follow the occupational disaster accident and investigation management procedures, carry out the investigation of the factors and formulate improvement measures, and discuss and publicize it in the occupational safety and health committee every quarter.</li> </ul>							
	E7	<ul style="list-style-type: none"> <li>消防安全</li> <li>設備安全</li> </ul>	<ul style="list-style-type: none"> <li>影響員工安全</li> <li>維運搶修的效率及品質，影響客戶通訊權益。</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>定期實施安全檢查及維護保養。</li> <li>採購設備或相關物品時，需將「有害物質的限制」列入要求。</li> </ul> <p>矯正措施：</p> <ul style="list-style-type: none"> <li>此項風險係因早期的設備維修需使用化學藥劑來處理，目前已多年未發生。然而為降低類似風險，故列入 SOP，並持續要求。</li> <li>若發生化學品使用風險時，將依危害性化學品管理標準作業程序，以及「有害物質的限制」中所指導的處理程序處理之。</li> </ul>	重要風險	100%	0%	--	TG CSMO/ 維修中心	<ul style="list-style-type: none"> <li>Y20 以零異常為目標</li> </ul>	<ul style="list-style-type: none"> <li>TWM 內網/技術群/主機房設備規範</li> <li>TWM 內網/工作規則</li> </ul>
	E7	<ul style="list-style-type: none"> <li>Fire Safety</li> <li>Equipment safety</li> </ul>	<ul style="list-style-type: none"> <li>Affect employee safety</li> <li>The efficiency and quality of UMG's repairs affect the rights and interests of customers.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with fire regulations in the computer room, establishment of an automatic fire protection system, escape safety passages, and indication of route signals</li> <li>Perform safety inspections and maintenance on a regular basis.</li> <li>When purchasing equipment or related items, "Restriction of Hazardous Substances" must be included in the requirements.</li> </ul> <p>Remediation</p> <ul style="list-style-type: none"> <li>This risk is due to the use of chemical agents to deal with the early equipment maintenance, which has not occurred for many years. However, in order to reduce similar risks, it is included in the SOP and continues to be required.</li> <li>If a chemical use risk occurs, it will be handled in accordance with the standard operating procedures for the management of hazardous chemicals and the handling procedures instructed in "Restriction of Hazardous Substances".</li> </ul>	Major risk	100%	0%	--	Technical Group	<ul style="list-style-type: none"> <li>2020 target is 0</li> </ul>	<ul style="list-style-type: none"> <li>TWM intranet/ Technical Group / Host room equipment specification</li> <li>TWM intranet / Work rules</li> </ul>



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客戶 Customer	<ul style="list-style-type: none"> <li>價值鏈上，〔客戶〕盡責調查涵蓋所有的弱勢群體。因為只要有合法證件，皆可成為 TWM 的客戶。</li> <li>In the value chain, [customer] due diligence covers all vulnerable groups. Because as long as there are legal documents, they can become TWM customers.</li> </ul>											
	C1	客戶個資保護-IT	用戶客訴被不當利用	<ul style="list-style-type: none"> <li>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。</li> <li>實體安全管理，定期檢查及分析 log 日誌並報告相關的執行結果。</li> <li>流程安全管理，定期檢查及分析 log 日誌並報告相關的執行結果。</li> <li>個人安全作業規範，定期檢查及分析 log 日誌並報告相關的執行結果。</li> </ul> <p>矯正措施：</p> <ul style="list-style-type: none"> <li>y19 並未發生資安和個資洩漏事件，惟資安與個資保護已是企業須高度關注的風險管理議題，且駭客手法不斷翻新，故仍列為高風險，持續關注並改善。</li> </ul>	重要風險	100%	0%	--	IT	<ul style="list-style-type: none"> <li>Y20 客戶個資，以零洩漏為目標</li> </ul>	<ul style="list-style-type: none"> <li>通訊品質反映 <a href="http://www.taiwanmobile.com/cs/public/qualityNoticeAction.do?method=enterPage">http://www.taiwanmobile.com/cs/public/qualityNoticeAction.do?method=enterPage</a></li> </ul>	
	C1	Customer Identity Protection- IT	Customer Complaint Identity Theft	<ul style="list-style-type: none"> <li>Comply with the company's PII (personally identifiable information) protection and safety standards, and perform regular internal and external audits.</li> <li>Physical security management -- Regularly check and analyze the log and report related execution results.</li> <li>Process safety management -- Regularly check and analyze the log and report related execution results.</li> <li>Personal safety compliance -- Regularly check and analyze the log and report related execution results.</li> </ul> <p>Remediation</p> <ul style="list-style-type: none"> <li>No information security and personal information leakage incidents occurred in y19. However, information security and personal information protection are risk management issues that companies must pay close attention to, and hacking methods are constantly being renovated, so they are still classified as high risks. Continue to pay attention and improve.</li> </ul>	Major risk	100%	0%	--	IT	<ul style="list-style-type: none"> <li>Y20 Target, zero leakage</li> </ul>	<ul style="list-style-type: none"> <li><a href="http://www.taiwanmobile.com/cs/public/qualityNoticeAction.do?method=enterPage">http://www.taiwanmobile.com/cs/public/qualityNoticeAction.do?method=enterPage</a></li> </ul>	
C2	@行銷方案規劃 客戶個資保護-處理或利用	處理或利用客戶資料時，未依規定，致洩漏個資讓將讓用戶暴露在人身財產風險中。	<ul style="list-style-type: none"> <li>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。</li> </ul> <p>矯正措施：</p> <ul style="list-style-type: none"> <li>目前的案例，皆是客戶質疑個人資料被利用於行銷上。並非真正的個資洩漏。此類作業，均依「機關客訴回函作業」執行。</li> <li>因此類客戶自認其人權受到影響而來客訴，故列入人權項目中。要求相關單位持續優化改善，避免客戶誤解。</li> </ul>	重要風險	100%	0.0001% (NCC 合約爭議數/有效用戶數) (y19	100% (機關客訴妥處比例)	行銷	<ul style="list-style-type: none"> <li>合約爭議與客訴，y20 目標同 y19 為 0.003%</li> </ul>	<ul style="list-style-type: none"> <li><a href="https://www.taiwanmobile.com/footer/static-privacy.html">https://www.taiwanmobile.com/footer/static-privacy.html</a></li> <li><a href="https://www.taiwanmobile.com/csonline/download/download.html">https://www.taiwanmobile.com/csonline/download/download.html</a></li> </ul>		

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							7 件 / 710.6 萬用戶)				
	C2	@ Marketing plan Customer personal data protection-handling or utilization	Leaking Personal Data will expose Customer to personal property risks	<ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Remediation</b></p> <ul style="list-style-type: none"> <li>In the current cases, customers questioned that personal data was used in marketing. It is not a real leak. Such operations are carried out in accordance with the 'Organization of Customer Complaint Responses' .</li> <li>As a result, such customer believe that their human rights are affected and come to complain, so they are included in the human rights project. Relevant department are required to continuously optimize and improve to avoid misunderstandings by customers.</li> </ul>	Major Risk	100%	0.0001% (NCC contract disputes / number of active users) (7 cases in y19 / 7.106 million users)	100% (Customer complaints properly handle ratio)	Marketing	<ul style="list-style-type: none"> <li>Contract disputes and customer complaints, y20 target is y19 with 0.003%</li> </ul>	<ul style="list-style-type: none"> <li><a href="https://www.taiwanmobile.com/footer/static-privacy.html">https://www.taiwanmobile.com/footer/static-privacy.html</a></li> <li><a href="https://www.taiwanmobile.com/csonline/download/download.html">https://www.taiwanmobile.com/csonline/download/download.html</a></li> </ul>
	C3	@銷售過程 & 售後服務 客戶個資保護-蒐集	蒐集客戶資料時，未依規定，致不當洩漏，影響客戶權益。	<ul style="list-style-type: none"> <li>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。</li> <li>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。</li> <li>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。</li> <li>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。</li> <li>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。</li> </ul> <p><b>矯正措施：</b></p> <ul style="list-style-type: none"> <li>y19 並未發生資安和個資洩漏事件，惟資安與個資保護已是企業須高度關注的風險管理議題，且駭客手法不斷翻新，故仍列為高風險，持續關注並改善。</li> </ul>	重要風險	100%	0%	--	CSMO	<ul style="list-style-type: none"> <li>Y19 未有不當洩漏之發生。</li> <li>Y20 標以客戶個資「零外流」。</li> </ul>	<ul style="list-style-type: none"> <li><a href="https://corp.taiwanmobile.com/social-responsibility/personalDataProtection.html">https://corp.taiwanmobile.com/social-responsibility/personalDataProtection.html</a></li> </ul>
	C3	@Sales process & Post-sales	If customers' personal data are improperly leaked, it will	<ul style="list-style-type: none"> <li>The standard of document verification: The store sales must check the applicant's "duel ID" to secure customer data.</li> </ul>	Major Risk	100%	0%	--	CSMO	<ul style="list-style-type: none"> <li>2019 No accidental data leakage occurred</li> <li>2020 target to have Zero Incidence of customer personal data leakage</li> </ul>	<ul style="list-style-type: none"> <li><a href="https://www.taiwanmobile.com/footer/static-privacy.html">https://www.taiwanmobile.com/footer/static-privacy.html</a></li> </ul>

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		service Customer's personal data protection-collection	affect customer rights.	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>Promote and pass SGS service verification every year, through SGS third-party verification, to ensure that the store complies with customer protection practices.</li> </ul> <p><b>Remediation</b></p> <ul style="list-style-type: none"> <li>No information security and personal information leakage incidents occurred in y19. However, information security and personal information protection are risk management issues that companies must pay close attention to, and hacking methods are constantly being renovated, so they are still classified as high risks. Continue to pay attention and improve.</li> </ul>						<ul style="list-style-type: none"> <li><a href="https://www.taiwanmobile.com/csonline/download/download.html">https://www.taiwanmobile.com/csonline/download/download.html</a></li> <li><a href="https://corp.taiwanmobile.com/social-responsibility/personalDataProtection.html">https://corp.taiwanmobile.com/social-responsibility/personalDataProtection.html</a></li> </ul>	