

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

*TWM 實施人權減緩措施的據點數量：704（含台灣大哥大及子公司等 8 家公司，以及 TWM 381 家直營店、315 家經銷據點）

*TWM implemented the number of sites with human rights mitigation measures: 704 (including TWM and 7 subsidiaries, as well as 381 direct stores and 315 franchise stores).

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.

Item	Topic identification	Human rights risk Impact assessment	Mitigation Processes 預防措施	Remediation Action 補救措施	Risk level	Due diligence results			Responsible Dept.	Target setting	Information disclosure
						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			
D2	職場健康	公司已採取防疫措施，員工仍在公司內染疫	<ul style="list-style-type: none"> ● 成立防疫應變指揮中心。 ● 訂定防疫計畫及防疫個案認定標準，實施疫情分級管理防疫措施。 ● 持續加強相關接觸者疫調，進行防範措施，防堵任何傳染風險，落實疾病預防宣導，提升人員的健康意識。 ● 持續配合政府滾動性調整各項防疫管控措施。 	<ul style="list-style-type: none"> ● 若發生感染事件，將進行居家隔離、居家上班及異地備援等備援計畫。 ● Y21 確診率 0.15%，針對確診同仁進行追蹤關懷，預防中重症的發生。 	重要風險	100%	0.15%	100%	勞安	● Y22 以降低同仁感染為目標	
D2	Workplace Health	TWM has taken anti-epidemic measures, and employees are still infected with the COVID-19 in the company	<ul style="list-style-type: none"> ● Establish an epidemic prevention and response command center. ● Formulate an epidemic prevention plan, the criteria for identification of epidemic prevention cases, implement hierarchical management and prevention measures. ● Continue to strengthen the epidemic investigation of related contacts, take preventive measures to prevent any risk of infection, implement disease prevention and publicity, and enhance the health awareness of personnel. ● Continue to cooperate with the government to adjust various epidemic prevention and control measures on a rolling basis. 	<ul style="list-style-type: none"> ● In the event of an infection, backup plans such as home isolation, home work, and remote backup will be implemented. ● Y21 Diagnosis rate 0.15% Follow up and care for the confirmed colleagues to prevent the occurrence of moderate and severe cases. 	Major risk	100%	0.15%	100%	Lab or Safety & Health	● Y22 Aiming to reduce the infection of employees	

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G1	強迫勞動	公司未能遵循法定規範，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"> Y21 目標:以零強迫勞動事件為目標 Y21 達成 100% Y22 目標同 Y21 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/csr/humanRights.html
G1	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"> Y21 Goal: Zero forced labor. Y21 Goal Achievement Rating : 100%. Y22 Goal : Same as the goal of Y21 	<ul style="list-style-type: none"> https://english.taiwanmobile.com/csr/humanRights.html
F1	工作與勞動條件保障	公司勞動條件未遵循法定要求，致基本工作權利未被充份保障	<ul style="list-style-type: none"> 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。 	<ul style="list-style-type: none"> 若發生不符合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	<ul style="list-style-type: none"> Y21 目標:100%遵循法定要求為目標 Y21 達成 100% Y22 目標同 Y21 	
F1	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	<ul style="list-style-type: none"> If any labor law is revised and created, we will comprehensively review the company's rules/regulations and working conditions of employees to ensure that all of them meet statutory requirements. 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Y21 Goal : 100% comply with laws. Y21 Goal Achievement Rating : 100% Y22 Goal : Same as the goal of Y21 	
H1	人身自由與安全	在工作場所遭受暴力、脅迫或恐嚇等	<ul style="list-style-type: none"> 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。 加強教育訓練，提供不法侵害預防 	<ul style="list-style-type: none"> 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 	重要風險	100%	0%	--	勞安	<ul style="list-style-type: none"> Y22 目標：至少不超過 Y21 申訴案件數 每三年進行一次風險評估和監測 	<ul style="list-style-type: none"> http://corp.taiwanmobile.com/social-responsibility/LO

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			課程。	導資源。							HASWorkplace.html
H1	Personal Freedom and Safety	Violence, coercion or intimidation in the workplace	<ul style="list-style-type: none"> ● Proclamation Prohibition of Workplace Violence Statement. Perform Workplace bullying hazard identification and risk assessment and monitoring for workplace abuse prevention. ● 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"> ● Y22 target: zero incidence Risk assessment and monitoring every three years. 	<ul style="list-style-type: none"> ● http://corp.taiwanmobile.com/social-responsibility/LOHASWorkplace.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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B1	孩童保護	提供之產品或服務，未依法令分級或提供適當的兒少保護措施	<ul style="list-style-type: none"> ● 未成年人申辦門號及促銷專案時，須取得法定代理人書面同意並攜帶「身分證正本」及「第二證件正本」，並限制未成年人不得於虛擬通路申辦，藉此保護未成年人。 ● 提供台灣大哥大用戶可申請「色情警衛」服務，針對兒童/青少年上網過濾情色內容，保護兒少遠離不當資訊。 	<ul style="list-style-type: none"> ● 若有非本人辦理申訴案件，將啟動調查，若屬實則退租門號，被冒名申辦者不需執行合約。 ● 若發現有新增內容未過濾，將請合作廠商更新資料庫，以執行更完善的防護網。 	重要風險	100%	0%	--	CBG	<ul style="list-style-type: none"> ● Y21 未有申訴件 ● Y22 目標同 Y21 	<ul style="list-style-type: none"> ● https://www.taiwanmobile.com/app/protector.html ● https://www.taiwanmobile.com/cs/public/faqAction.do?method=queryFaq&svcType=f006&productType=1000&utm_source=service&utm_medium=new_navi&utm_campaign=faq_apply
B1	Child Protection	Provide products or services that are not graded by law or not provide appropriate protection measures for children and the youth.	<ul style="list-style-type: none"> ● When minors apply for rate plans, they must obtain the written consent of a legal representative with their "ID card" and "secondary ID card", and minors are banned to apply rate plans through virtual channels to protect them. ● Provide "Pornography-banned Guard" service that filters pornographic contents for children and teenagers and protect them from inappropriate information. 	<ul style="list-style-type: none"> ● If there is an appeal that the mobile contract is not signed by the applicant, an investigation will be initiated. If confirmed to be true, the applicant could quit the contract and the service unconditionally. ● If any new content is not updated, the Company will inform the vender to update the database, in order to provide a more complete protection network. 	Major risk	100%	0%	--	CBG	<ul style="list-style-type: none"> ● No complaint in Year 2021. ● The target of Year 2022 is the same as Year 2021. 	<ul style="list-style-type: none"> ● https://www.taiwanmobile.com/app/protector.html ● https://www.taiwanmobile.com/cs/public/faqAction.do?method=queryFaq&svcType=f006&productType=1000&utm_source=service&utm_medium=new_navi&utm_campaign=faq_apply
K1	科技包容性	針對多元社會族群，未能提供便利使用之產品和服務	<ul style="list-style-type: none"> ● 針對多元族群，因應高齡化、身心障礙者、學生及偏鄉學童之數位落差問題，提供「銀髮案」、「身障案」、「學生案」及台灣大基金會推出「數位苗圃」計畫，幫助多元族群更無負擔享受產品及服務。 	<ul style="list-style-type: none"> ● 若多元族群有新增需求而現行專案無法因應，將評估後進行調整。 	重要風險	100%	0%	--	CBG	<ul style="list-style-type: none"> ● Y21 未有申訴件 ● Y22 目標同 Y21 	<ul style="list-style-type: none"> ● https://corp.taiwanmobile.com/presentation/news/press_20210521_591778.html ● https://www.taiwanmobile.com/cson

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											line/service/normal/normal_20190829_172821.html <ul style="list-style-type: none"> ● https://www.taiwanmobile.com/csonline/service/normal/normal_20191101_101512.html
K1	Technology Inclusiveness	Products and services that are not facilitate to the usage of diversified social groups.	<ul style="list-style-type: none"> ● In response to the issues of the elderly, the disabled, and students, the Company has provided diversified rate plans for those groups, and to solve digital differentiation between urban and rural students. Besides, the Company also has provided some students who are eligible to get learning digital languages with no cost for one year. Those are to help diverse social groups to enjoy products and service with no burden. 	<ul style="list-style-type: none"> ● If there is any new demand from diversified social groups which current rate plans could not fulfill, the Company will evaluate adjustment of the rate plans accordingly. 	Major risk	100%	0%	--	CBG	<ul style="list-style-type: none"> ● No complaint in Year 2021. ● The target of Year 2022 is the same as Year 2021. 	<ul style="list-style-type: none"> ● https://corp.taiwanmobile.com/press-release/news/press_20210521_591778.html ● https://www.taiwanmobile.com/csonline/service/normal/normal_20190829_172821.html ● https://www.taiwanmobile.com/csonline/service/normal/normal_20191101_101512.html

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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L2	社區居住品質	未採行可降低汙染氣體排放與噪音措施	● 機房建置採用減振、減噪設計、並採用黑煙淨化器避免發電機黑煙排放，維持對社區民眾乾淨空氣與寧靜生活品質權益。	● 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。	重要風險	100%	0%	--	TG	● 機房周遭民眾不因居住品質受影響而客訴。
L2	Living Quality	No actions on reducing air pollution, and noise	● Adopting vibration-ease and noise reduction design in construction, and using purifiers to avoid smoke emission from generators to maintain the rights of clean air and life quality of the neighborhood.	● Providing a complaint channel and developing a grievance mechanism for community complaints if human rights violations. TEL : 0809-000-852 / 02-66062999	Major risk	100%	0%	--	TG	● No complain that neighborhood being affected by the quality of live.

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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F1	工作與勞動條件保障	公司未能確保員工於職場上的健康、安全與應享有的對待，導致員工的身心健康或個人生活受到衝擊	<ul style="list-style-type: none"> ● 要求供應商制定勞動管理辦法與職業安全衛生管理辦法，並依照法規執行 ● 要求供應商制定營運持續管理機制 	<ul style="list-style-type: none"> ● 要求供應商說明違規事項並提出具體改善行動 ● 持續要求供應商制定營運持續管理計畫，並每年透過 ESG 審查檢視執行現況，評估是否達到所需的管理強度。 	重要風險	89.46 %	0.2% (1/501 = 0.2%)	100%	採購	<ul style="list-style-type: none"> ● 於供應商年度 ESG 調查中追加調查營運持續管理計畫制定狀況。 ● 2022 年 80% 一階關鍵供應商訂定營運持續管理計畫。 	
F1	Guarantee of Job and Labor Conditions	The company cannot ensure the health, safety and proper treatment of employees in the workplace, resulting in negative impact on employees' physical and mental health or personal life	<ul style="list-style-type: none"> ● Suppliers are required to develop labor management regulation, Occupational Safety and Health Act and update them in accordance with latest regulations. ● Suppliers are required to develop a continuous operation management (such as BCM) mechanism. 	<ul style="list-style-type: none"> ● Require suppliers to describe violations and propose specific corrective actions. ● Continued to require suppliers to formulate the operation management (such as BCM) mechanism, and review the implementation status through ESG review every year to assess whether the required management intensity has been achieved. 	Major risk	89.46 %	0.2% (1/501 = 0.2%)	100%	procurement	<ul style="list-style-type: none"> ● Pursued the status of the development of the operational continuity management plan in the annual ESG survey of suppliers. ● By 2022, 80% of critical tier-1 suppliers have an BCP. 	
A1	個資與隱私保護	於服務規劃或系統開發時，未能秉持”隱私始於設計”(Privacy by Design, Privacy by Default)，導致未妥善保護個資/隱私，並侵害當事人權益	<ul style="list-style-type: none"> ● 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 ● 要求特定類別供應商(如：資通訊類設備與服務之供應商)需具備營業秘密保護、機敏資料管理、個資保護等相關制度 ● 每年透過供應商 ESG 審查確認供應商的個資保護機制執行狀況以及法遵情形 	<ul style="list-style-type: none"> ● 每年持續進行供應商 ESG 審查，並將資安議題列為必要風險評鑑項目。 ● 如供應商發生資料外洩事件，將立即暫停採購與使用相關產品，並要求供應商配合調查。 	重要風險	89.46 %	0.4% (2/501 = 0.4%)	100%	採購	<ul style="list-style-type: none"> ● 2021 年零個資外洩事件。 ● 2022 年完成一階關鍵供應商三年累積審查覆蓋率 85% 以上。 	

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A1	Personal Data and Privacy Protection	Failure to uphold "Privacy by Design, Privacy by Default" during service planning or system development, resulting in failure to properly protect personal information/privacy and infringing on the rights and interests of the parties	<ul style="list-style-type: none"> Announced the "Supplier CSR Code of Conduct" as a CSR guideline for suppliers It is required that certain types of suppliers (e.g. suppliers of information and communication equipment and services) need to have relevant systems such as trade secret protection, sensitive data management, and personal information protection. The supplier's personal asset protection mechanism and compliance status are confirmed annually through the supplier's ESG review. 	<ul style="list-style-type: none"> Supplier ESG reviews are conducted annually and security issues are listed as necessary risk assessment items. In the event of a data breach by the Supplier, the Purchase and Use of the Relevant Products will be suspended immediately and the Supplier will be required to cooperate with the investigation. 	Major risk	89.46 %	0.4% (2/501 = 0.4%)	100%	procurement	<ul style="list-style-type: none"> Zero personal information leakage incidents in 2021. In 2022, the three-year cumulative review coverage rate of first-order key suppliers will be more than 85%.