

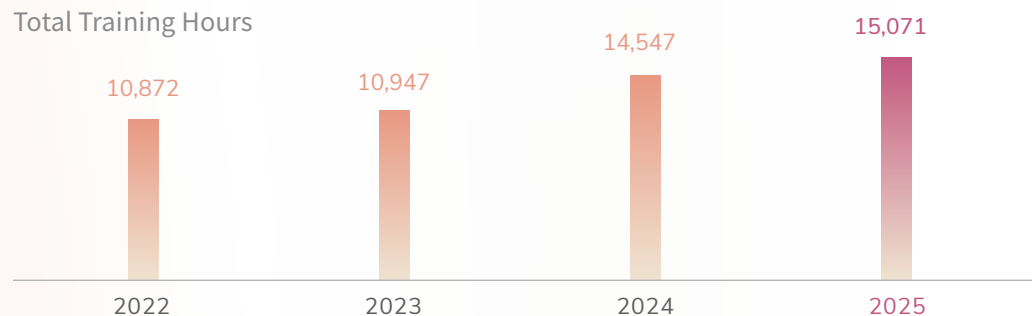
4.1 / Human Rights

Employee Human Rights Protection

Nanya Technology places strong emphasis on labor rights and has established a [Human Rights Policy](#) as well as [Labor and Ethics Policy](#). These policies adhere to international human rights standards, including the Responsible Business Alliance (RBA) Code of Conduct, SA8000 Social Accountability Standard, International Labour Organization (ILO) conventions, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the General Data Protection Regulation (GDPR), along with relevant local laws. Nanya Technology promotes human rights risk assessment and management to build a supportive workplace that embraces inclusivity and diversity.

We promise never to employ child labor under the age of 16 and affirm that we have never done so in the past. Moreover, we will never force or coerce any individual to work against their will. All employment terms are voluntarily agreed upon through mutual consent. Our 2025 Human Rights Policy and Procedure Training Programs include "Policy and Code of Conduct Training," "Unsafe Workplace Behavior and Prevention Training," and "Personal Data Protection Training." These programs were mandatory for all employees, with a 100% training rate and a total of 15,071 training hours.

» 2022–2025 Human Rights Policy and Procedures Education Programs Training Hours^{Note}

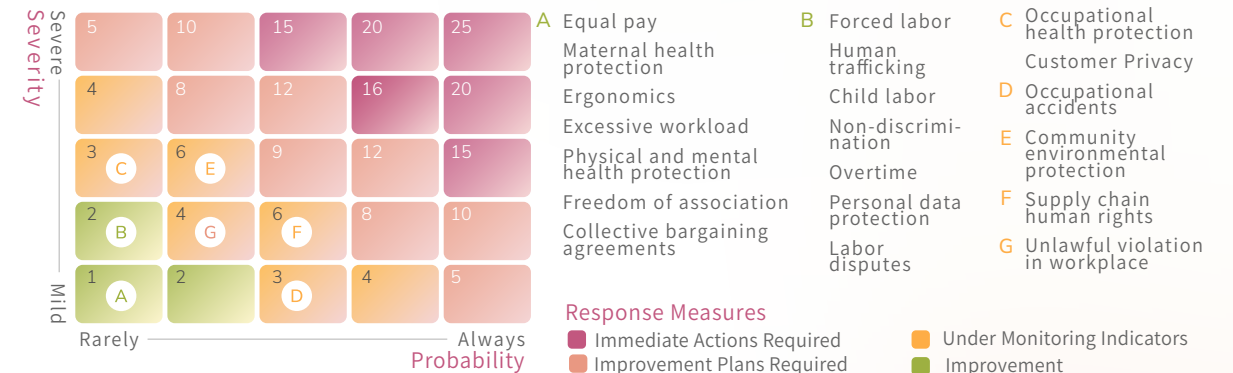


Note: Human Rights Policy and Procedure Training Programs for all employees cover our labor and ethics regulations, RBA code of conduct, prevention of unsafe workplace behavior and other areas.

Human Rights Risk Management

Nanya Technology adopts RBA standards for labor, health and safety, and environment, as well as government occupational safety and health regulations. We identify human rights issues, vulnerable groups, and associated business units to conduct human rights risk assessments. These assessments target our employees and stakeholders (including customers, suppliers/contractors, agents, joint ventures, alliance partners, and local communities). Based on the assessment results, we establish risk mitigation and compensation measures, and strictly adhere to the regulations of the countries where these subjects operate. In addition, we calculate the risk likelihood based on the proportion of employees exposed to risks relative to the total number of our employees. We use these results to formulate annual improvement measures and future human rights risk mitigation goals.

» Human Rights Due Diligence Procedures





» Nanya Technology Human Rights Risks Assessment Form

Subject	Human Rights Issues	Assessment Tools
 Employees	Freedom of choice in employment, Young workers, No discrimination, Work hours, Wages and benefits, Humane treatment, Freedom of association, Occupational health and safety, Personal data protection, Unlawful violation in workplace	RBA SAQ, RBA VAP, Internal and External Audits, Grievance Channel, Occupational Injury Report Form, Department of Labor Annual Average Frequency-Severity Indicator by Industry (Excluding Commute-Related Incidents), Health Examination Report Indicator
 Supplier (Joint Venture)	Labor rights, Occupational health and safety, Personal data protection, Unlawful violation in workplace Responsible mineral, Hazardous substances free	Supplier audits, Independent third-party verification Inspection tools (CMRT/EMRT etc.), Due diligence, Independent third-party verification, Compliance (testing) report
 Communities	Water resources, Air pollution, Noise, Traffic issues	Government regulations, Facility wastewater discharge quality monitoring, Air quality monitoring, Noise frequency monitoring, Traffic flows assessment and monitoring
 Customers	Personal data protection and information security	Annual risk assessment, Internal audits and external independent verification



» Mitigation and Compensation Measures for Highly Significant Human Rights Impacts

Subject	Material Human Rights Issues	2025 Mitigation Measures	2025 Compensation Measures
 Employees	Occupational health and safety	• Occupational Health and Safety Management System (1) Hazard identification and risk assessment: Regular and ad-hoc reviews of hazard identification and risk assessment results. We conducted a total of 45 internal audits in 2025, resulting in 11 corrective action requests. (2) Proactive risk mitigation measures: High-risk units actively develop and propose safety and health improvement action plans, reducing medium- and high-level risks and increasing opportunities for systematic improvement. A total of 22 management plans were proposed in 2025. (3) Regular performance assessment system: Safety and health performance reviews conducted by each unit, as well as environmental inspection proposals submitted by the Safety and Health Department and independent inspection proposals submitted by each department (independent inspection rate reached 94.8% in 2025, exceeding the annual goal of 94.1%). • Promoting and Establishing Safety Culture (1) Safety Walk and Talk (SWAT): We conducted 48 Safety Walk and Talks, including on-site sessions led by executive-level managers, as well as sessions with employees led by the Safety and Health Department or department managers.	• Contingency Response and Preparation (1) We have established the Contingency Procedures for Non-Conforming Situations, which outline contingency plans and include drills for high-risk units. In total, 55 sessions have been conducted. (2) We cooperated with local authorities to conduct ad-hoc contingency response and disaster drills for public hazardous materials and toxic chemicals leaks, continuously enhancing our disaster response measures. • Accident Investigation and Constant Improvement (1) In the event of unforeseen incidents or occupational accidents, the responsible unit(s) and the Safety and Health Department will form an Accident Investigation Taskforce. The responsible unit(s) need to propose corrective actions and review relevant procedures with the Safety and Health Department for tracking and continuous improvement. In 2025, a total of 21 near misses were recorded, with liquid-related cases identified as the key improvement area (15 cases or 71.4%). Key improvement efforts focused on preventing issues such as condensate pipeline joint leaks and water seepage from building exteriors. Corresponding improvement and prevention measures were submitted accordingly. (2) The Safety and Health Committee convened on a monthly basis, exceeding the frequency required by relevant regulations. The responsible unit(s) report on the causes of occupational accidents and promote improvement plans to prevent similar incidents in other units. • Compensation for Occupational Accidents (1) In the event of occupational accidents, we promptly initiate emergency medical treatment and provide comprehensive medical assistance afterwards. We also offer leave and wage compensation in accordance with legal requirements.
	Occupational health protection	• All personnel : To enhance health management awareness, we organize the following health promotion activities: (1) Hosting at least one health promotion lecture per quarter. In 2025, we conducted 17 lectures, with a total of 1,367 participants. (2) Hosting annual weight-loss and quit-smoking pledge events, with a total of 435 participants. (3) Providing employees with relevant health information regularly (via posters and emails). • Engineers : (1) Implementing programs for the prevention of diseases related to abnormal workloads. (2) Identifying and assessing high-risk groups. (3) Providing special health examinations as well as health management and promotion plans.	General compensation principles are as follows: (1) Employees with abnormal health examination results are continuously tracked and provided with ongoing health management. Regular medical consultations and health guidance are also provided. (2) An on-site clinic is established and doctor visits are arranged to provide professional medical and consulting services for employees. General compensation principles are as follows: (1) Arranging doctor appointments and providing health guidance. (2) Advising the department manager and further investigating the situation.

Subject	Material Human Rights Issues	2025 Mitigation Measures	2025 Compensation Measures
 Employees	Unlawful violation in workplace	• The following preventive measures are in place to address unlawful violations in workplace : (1) We have implemented training to prevent unlawful violations in workplace, including bullying and sexual harassment, achieving a 100% completion rate in 2025. (2) We have established a comprehensive grievance procedure with confidential investigations conducted by a dedicated taskforce. The Grievance Review Committee will make impartial final decisions on grievance cases.	• 0 unlawful violations in workplace in 2025 General compensation principles are as follows: (1) Implementing measures such as adjusting job duties or work environment as appropriate to prevent recurrence of unlawful violation in workplace against the complainant. (2) Providing or referring the complainant to consultation, medical or psychological counseling, social welfare resources, and other necessary services. (3) A thorough investigation will be conducted into the grievance case. If violations are substantiated, appropriate disciplinary actions and measures will be taken against the perpetrator. If criminal offenses are involved, we may also refer the case to the judicial authorities for legal proceedings. (4) We will continuously track, assess, and monitor substantiated cases to prevent future incidents of unlawful violations in workplace. (5) Retaliation against complainants, whistleblowers, or individuals assisting with investigations is strictly prohibited. Violators will be subject to disciplinary action in accordance with company management regulations.
 Supplier (joint ventures)	Work hours, Wage and benefits, Humane treatment, Unlawful violation in workplace, Environment and safety	• To ensure the suppliers' commitment to sustainability, we implement the following measures: (1) We conducted sustainability risk assessments for all Tier 1 suppliers, including Tier 1 significant suppliers, encompassing a total of 355 suppliers with a 100% completion rate. (2) We enforced audits on high-risk suppliers, identifying a total of 94 non-conformances. Nanya Technology assists these suppliers in making improvements, achieving a 100% remediation rate. (3) We evaluate potential impacts across supplier governance, social and environmental aspects, and continuously encourage suppliers to conduct risk management and identification measures. (4) We requested our joint venture Formosa Advanced Technologies to promote human rights due diligence and RBA VAP to proactively identify and mitigate human rights risks in order to prevent human rights violations. Please refer to Formosa Advanced Technologies' Sustainability Report for the disclosure of relevant due diligence findings. https://www.fatc.com.tw/esg/download.php	• 0 human rights violations in 2025 General compensation principles are as follows: Requiring suppliers to make improvements and comply with local regulatory requirements.
	Responsible mineral, Hazardous substances free	• Responsible Mineral Management (1) Monitoring evolving trends in the requirements of responsible mineral sourcing management and developing a corresponding responsible mineral sourcing management list. (2) Employing effective tools (CMRT/EMRT, etc.) to conduct regular due diligence. (3) Aiming for 0 deficiencies during independent third-party verifications. • Hazardous Substance Free Management (1) Identifying the relevance of regulations to customer products and developing a corresponding hazardous substance management list. (2) Conducting regular due diligence and providing effective compliance (testing) reports. (3) Aiming for 0 deficiencies during independent third-party verifications.	• 0 human rights violations and hazardous substances incidents in 2025 General compensation principles are as follows: Suppliers are required to make improvements and comply with local regulations.

Subject	Material Human Rights Issues	2025 Mitigation Measures	2025 Compensation Measures
 Communities	Air pollution Water resource	- Implementing the following measures to ensure environmental sustainability: (1) Discharging wastewater in compliance with regulatory standards and continuously reducing discharge volumes: A. Air pollution reduction: For the FAB-3A-N plant, total suspended particulate emissions from exhaust gases were reduced. In 2025, third-party verification confirmed an 82% decrease in emissions compared to 2024. B. Water resource shortage: (a) Diversifying Water Sources and Enhancing Storage: Having constructed a water reservoir capable of holding 43,000 metric tons and built 7 additional wells in our facilities, we now have a combined daily water supply of 5,500 metric tons. (b) We collaborate with nearby Formosa Plastics Group facilities to establish an emergency response organization for water shortages, enabling mutual sharing of water resources during emergencies within the organization. (c) Water conservation and rainwater/wastewater recycling: Beyond rainwater reuse initiatives, we recycled a total of 5,530,024 metric tons of wastewater in 2025. (d) Establishing response measures aligned with government-issued water situation lights. C. Effluent quality maintenance: (a) Collected wastewater is classified and directed to the appropriate wastewater treatment facilities for treatment. Our treatment efficiency has improved over the years. (b) We have established a real-time effluent quality monitoring system linked to the Environmental Protection Department of the municipal government, enabling joint monitoring to ensure effluent quality remains within normal parameters. (2) We conduct monthly environmental inspections. (3) We collaborate with local communities to form an Environmental Quality Supervision Committee. Feedback from local stakeholders is gathered through quarterly Nanlin Technology Park Management Committee meetings.	0 complaints from communities in 2025 General compensation principles are as follows: (1) Paying close attention to the evolution of regulations and adopting corresponding measures. (2) Actively engaging with local schools, organizations, and groups to implement educational initiatives such as environmental conservation.
	Social engagement	- We commit to engaging in public affairs and caring for the local communities, exerting social influence and promoting community development through the following measures: (1) Talent cultivation: We partnered with schools to instill ESG sustainability concepts in youths and promote sustainability education to 1,387 students. (2) Environmental conservation: We connect with diverse non-profit organizations to promote environmental awareness, maintain biodiversity, and move towards a low-carbon society, with 598 employee participations in 5 environmental conservation events. (3) Community harmony: We participate in neighborhood (nearby community) public affairs to create a harmonious and mutually beneficial living environment, benefiting 16,433 people. (4) Humanistic care: We integrate local resources to promote local culture, with 454 employee participations in cultural events in 2025.	
 Customers	Personal data protection and information security	- We implement the following measures to safeguard information security: - We implement the following information security management measures to protect customers' rights: (1) We established the Confidential Information Management Procedure, Personal Data Management Rules, and Privacy Protection Policy, requiring all employees to read. (2) We conduct monthly information security awareness campaigns, and require employees to complete information security training courses and pass relevant assessments once a year to enhance personal data protection awareness. The completion rate was 100% in 2025. (3) The Company's confidential information is archived in the Document Control Center in accordance with internal procedures and classified by confidentiality level. Unauthorized disclosure of the Company's confidential information is prohibited, and relevant evaluation mechanisms have also been established. (4) We install metal detectors at entrances for inspecting information security-controlled items. (5) We regularly apply for ISO 27001 international information security management certification.	0 information breach incidents in 2025 General compensation principles are as follows: We will inform the customers immediately and provide proper remedies.

In 2025, the risk occurrence rate was 3.55%, remaining unchanged compared to 2024. In recent years, the Company's risk occurrence rate has remained relatively low, primarily because we prioritize the physical and mental well-being of employees and workplace safety, supported by comprehensive care and management systems. For employees with abnormal health check results, the Company ensures ongoing follow-up care, access to professional medical consultations, and immediate on-site medical support. Upon receiving complaints, we promptly activate processing mechanisms in accordance with regulations. Work duties or environments are adjusted as needed, and where appropriate, medical care, psychological counseling, and social resources are provided. Confirmed violations are handled in accordance with company regulations, with disciplinary actions imposed as required. Cases involving potential criminal liability are referred to judicial authorities, and continuous monitoring and corrective actions are carried out to reduce the risk of recurrence. In addition, regular occupational safety and health meetings are held to review incident causes and implement preventive measures, thereby comprehensively strengthening workplace safety.

Employee Protection and Communication

Zero-Tolerance for Harassment and Discrimination

Nanya Technology upholds a zero-tolerance policy for harassment and discrimination

 Policy Declaration	To protect all employees from physical or psychological violations that may cause physical or mental illness while performing their job duties, Nanya Technology has established a "Prohibiting Unlawful Violation in Workplace Statement".	 Education and Training	We conduct training on preventing unlawful violations in workplace for all employees at least once every two years. Supervisory seminars are held as needed to enhance employee communication and reduce stress and frustration. In 2025, a total of 3,750 employees passed on-the-job training, achieving a 100% completion rate.
 Zero Tolerance	We are committed to ensuring zero unlawful violations in workplace^{Note}, which includes absolutely no tolerance for workplace bullying by any managerial-level supervisor, nor any tolerance for workplace violations such as workplace violence among employees, or by visitors, customers, and strangers towards our employees.	 Disciplinary Measures	Grievance cases will be investigated confidentially by the Grievance Investigation Taskforce and arbitrated by the Grievance Review Committee. If the allegations are substantiated, disciplinary action will be taken in accordance with company management regulations. If criminal offenses are involved, we may also refer the cases to the judicial authorities for legal proceedings.
 Grievance Channels	Together, all employees share the responsibility of maintaining a working environment free from unlawful violation in the workplace. Anyone who witnesses or hears of any workplace violation incident should immediately call the employee grievance hotline or use the internal grievance mailbox to report the incident.  Grievance Hotline: 02-29045858 #1132~#1136  Grievance Mailbox: protection@ntc.com.tw	 Remedial Measures	We will strictly maintain the confidentiality of the complainant's identity and provide assistance and compensation measures such as health guidance, work adjustment or reassignment, and follow-up on physical and mental well-being.

Note: Definition of Unlawful Violation in Workplace
Incidents where employees experience maltreatment, threats, harassment, discrimination, or attacks in a working environment (including commute) that clearly or implicitly endanger their safety, well-being, or health. Forms of unlawful violation in workplace include:

- I. Non-sex or non-gender related violation
 - (1) Physical abuse: Acts of violence or physical aggression causing harm (e.g., assault, scratching, punching, kicking, etc.)
 - (2) Psychological abuse: Mental harm through coercion or humiliation (e.g., threats, bullying, severe verbal abuse, etc.)
 - (3) Verbal abuse: Language offenses through inappropriate words or tone (e.g., bullying, intimidation, interference, etc.)
 - (4) Discrimination: Making employment decisions or impairing working conditions based on characteristics unrelated to the specific job requirements.
 - (5) Harassment: Repeated or continuous interference or disruptive behavior against a specific person's will, causing discomfort or a sense of threat.
- II. Sex or gender related violations
 - (1) Sexual harassment: Sexual advances against a person's will (e.g., inappropriate sexual innuendos and actions, etc.)
 - (2) Gender harassment: Remarks with gender discrimination or prejudice, particularly those that are insulting, demeaning, or hostile towards a particular gender.

Even before the issuance of the Unlawful Violation in Workplace Guidelines, Nanya Technology already established the Workplace Sexual Harassment Prevention, Grievance and Disciplinary Policy and the Nanya Technology Employee Protection and Complaint Regulations. These rules outline relevant prevention and subsequent investigation and handling measures for employees facing inappropriate treatment in the workplace. Our company also has a counseling room in place and collaborates with the Teacher Chang Foundation, providing on-site counseling services as a channel for employees to confide and seek advice. In 2025, counseling services were utilized 65 times, totaling 65 hours. Furthermore, we regularly conduct workplace mental health promotion seminars to offer stress relief channels for employees.



Establishing Norms

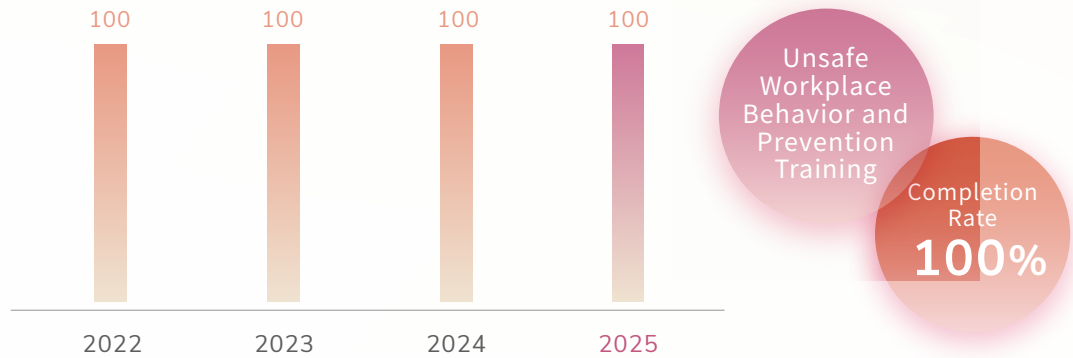
- We integrated the Workplace Sexual Harassment Prevention, Grievance and Disciplinary Policy and the Nanya Technology Corporation Employee Complaint Guidelines into the Nanya Technology Employee Protection and Complaint Regulations in 2019, and made relevant revisions in 2020 and 2023 respectively to enhance the comprehensiveness of our regulations.
- Revised the Workplace Sexual Harassment Prevention, Grievance and Disciplinary Policy according to regulatory mandates in 2024.
- Revised the Nanya Technology Employee Protection and Complaint Regulations according to regulatory mandates in 2025.



Implemented Actions

- Conducting annual online "Unsafe Workplace Behavior and Prevention Training" for all employees.
- Conducting employee protection, hazard identification and risk assessments for each department to further manage potential at-risk groups.
- Strengthening the grievance investigation mechanism by establishing a permanent Grievance Review Committee.
- Establishing a counseling room and collaborating with the Teacher Chang Foundation for on-site counseling services.
- In 2024, we implemented the revised Workplace Sexual Harassment Prevention, Grievance and Disciplinary Policy and engaged external experts, such as academics and lawyers in relevant fields, to participate in complaint investigations.
- In 2025, we implemented new workplace bullying prevention measures in accordance with the Occupational Safety and Health Act and engaged external experts, such as academics, lawyers, and psychologists in relevant fields, to participate complaint investigations. Strengthening managers' performance management and coaching capabilities by providing systematic tools and training, enabling them to implement and fully execute PIP procedures in accordance with established guidelines.

» Unlawful Violation in Workplace Training Statistics



■ Grievance and Whistleblower Channels

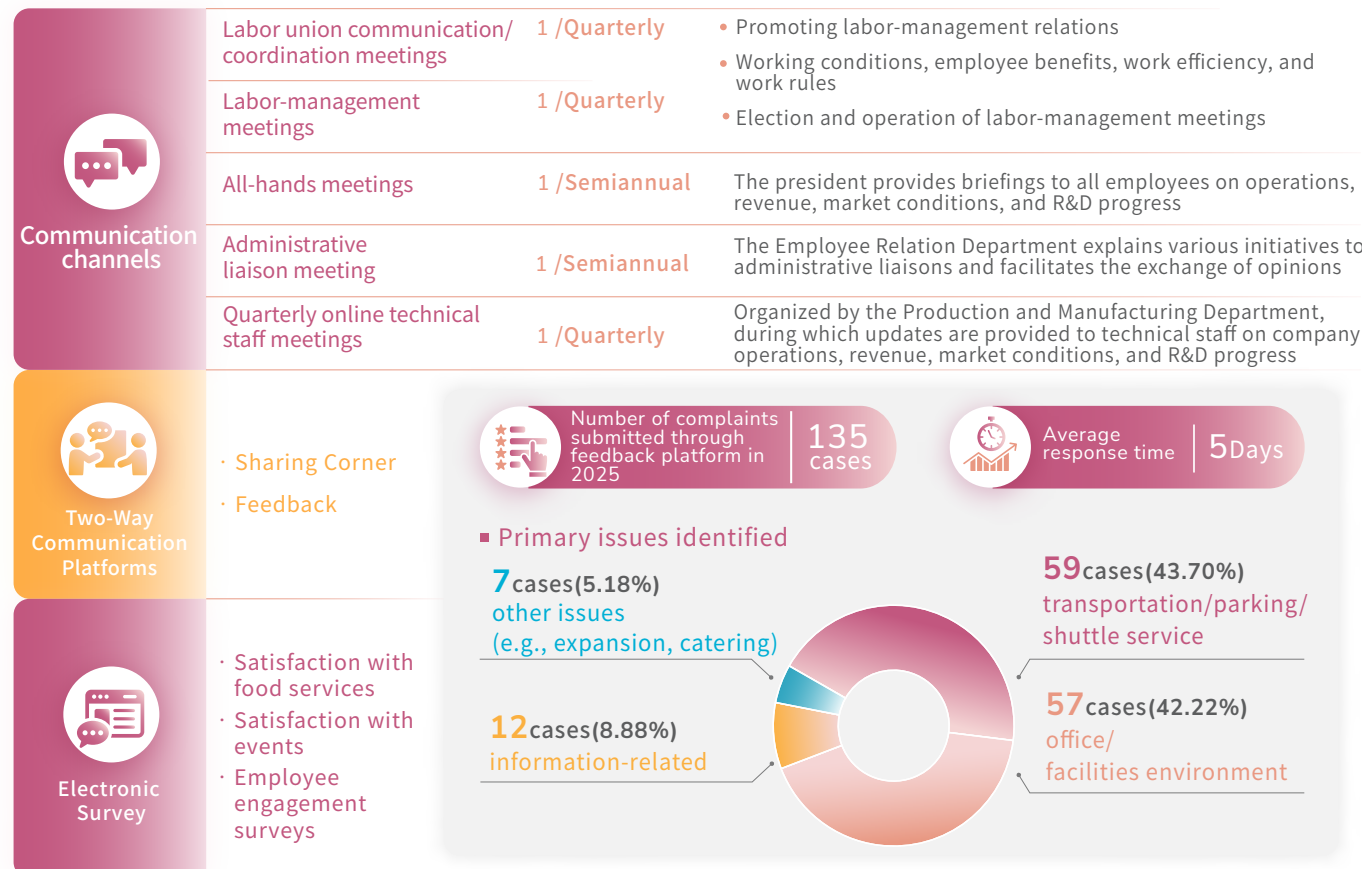
Nanya Technology has established various grievance channels in accordance with the Nanya Technology Employee Protection and Complaint Regulations, the Workplace Sexual Harassment Prevention, Grievance and Disciplinary Policy, and the Nanya Technology [Reporting Procedure](#). These channels provide internal and external stakeholders with avenues to report any illegal or unethical conduct when they witness illegal or inappropriate behavior that significantly affects the rights and interests of individuals or the Company, or when someone attempts to exploit their role for improper gains. Depending on the case, the Audit Department or the Grievance Review Committee will handle the report. For cases involving unlawful violations in workplace, the Grievance Review Committee will form an investigation taskforce and engage external experts in accordance with legal regulations. Additionally, a dedicated whistleblower hotline (02-29061001) and mailbox (audit@ntc.com.tw) are published on the Company's official website to allow stakeholders to report incidents of rights infringements. Based on the details, category, nature and sensitivity of the cases, as well as the level of the reported individuals, an appropriate case handler will be assigned, or a taskforce will be formed for investigation. Cases involving managers or directors will be investigated by a taskforce composed of directors from the Management Audit Department. To protect whistleblowers, case handlers will maintain confidentiality by strictly prohibiting the disclosure of case details to irrelevant personnel during investigations. When relevant individuals are under investigation, discussions will be limited to aspects directly related to their involvement in the case to protect the complainants' identity. All relevant data will be handled and archived as confidential documents.

» Number of Grievance and Reporting Cases Received in the Past Years, by Channel

Year			2022		2023		2024		2025	
Grievance Channel	Letters of complaint (including anonymous reports)		4		0		3		5	
	Employee Grievance Form		0		2		3		0	
	Whistleblowing hotline and mailbox		1		1		1		2	
	Total		5		3		7		7	
Case Category			Substantiated	Dismissed	Substantiated	Dismissed	Substantiated	Dismissed	Substantiated	Dismissed
Case Category	Cases Related to Employee Protection	Personal privacy/data protection	0	0	0	0	0	0	0	0
		Sexual harassment	0	0	2	0	1	0	0	0
		Harassment	0	0	0	0	0	0	0	1
		Discrimination	0	0	0	0	0	0	0	0
		Environmental protection	0	0	0	0	0	0	0	0
		Occupational health and safety	0	0	0	0	0	2	0	0
	Cases Related to Business Ethics	Corruption and bribery	0	1	1	0	1	0	0	0
		Illicit gains	0	0	0	0	0	0	0	0
		Fair competition	0	0	0	0	0	0	0	0
		Questionable donations	0	0	0	0	0	0	0	0
		Conflicts of interest	0	0	0	0	0	0	0	1
		Money laundering or insider trading	0	0	0	0	0	0	0	0
		Intellectual property protection	0	0	0	0	0	0	0	0
		Customer privacy data	0	0	0	0	0	0	0	0
	Others		1	3	0	0	1	2	0	5
	Total substantiated cases			1		3		3		0
Resolution rate			100%		100%		100%		100%	

Labor Relations and Communication

To cultivate harmonious labor relations, promote cooperation between labor and management, and enhance employee welfare, we have established diverse and transparent communication channels. These mechanisms enable employees to express their views on fundamental working conditions, including health and safety and employee benefits. We actively seek to understand employee concerns and address issues promptly to foster positive labor-management communication. For reporting illegal activities, we have grievance channels, a whistleblower hotline, and a sexual harassment prevention hotline in place. Employees can also provide feedback on Company rules and regulations through the management system feedback channel. Employees may openly and fully communicate with management on matters related to public and private domains, working conditions, compensation and benefits, or personal opinions. The available communication channels are as follows:



Nanya Technology established its labor union by employees in April 2012. Over the years, the Company and the labor union have actively maintained bilateral communication channels and a harmonious relationship. We exchange information and discuss working conditions (e.g., evaluation of breaks) through various channels, allowing the labor union to fully exercise its role and express opinions, thereby enhancing labor relations and employee welfare. Although a company labor union has been established, no collective bargaining proposal or agreement has been initiated to date. This is because the labor union and the Company have maintained diverse and smooth communication channels, with the Company actively responding to these discussions.

» Number of Labor Union Members in Taiwan Over the Past Four Years

Nationalities	2022	2023	2024	2025
Number of Labor Union Members	86	88	88	108
Labor Union Membership Rate	2.40%	2.49%	2.45%	2.91%

Number of Labor Union Members/Rate

