

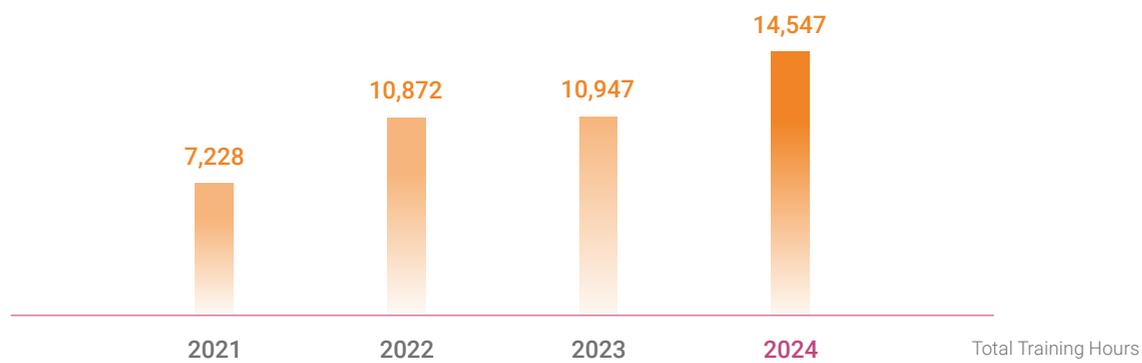
# Human Rights

## 1. Employee Human Rights Protection

Nanya Technology is highly attentive to labor rights and has established a [Human Rights Policy](#) as well as [Labor and Ethics Policy](#). These policies follow 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 EU 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 2024 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 courses were mandatory for all employees, with a 100% training rate and a total of 14,547 training hours.

2021-2024 Human Rights Policy and Procedures Education Programs Training Hours<sup>Note</sup>

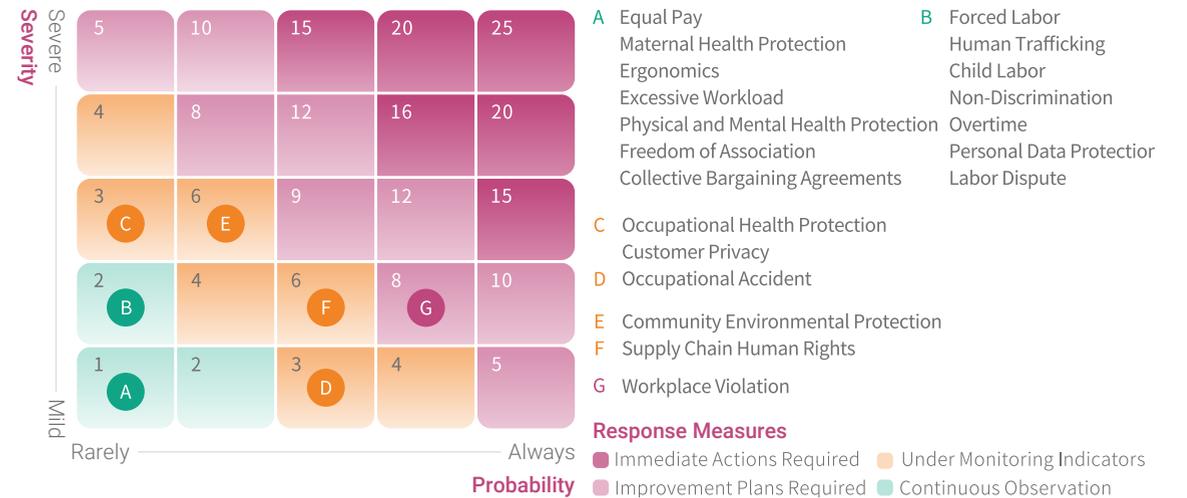
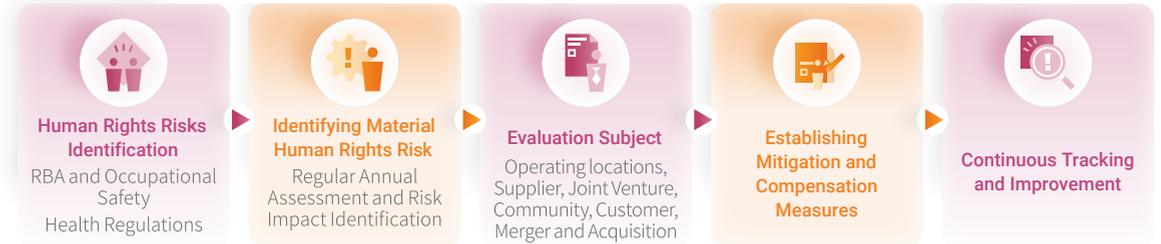


Note: Human Rights Policy and Procedure Training Programs for all employees cover our labor and ethics regulations, RBA code of conduct, prevention of unsafe workplace behavior and other areas. Since 2022, "Personal Data Protection Training" has been a mandatory annual course for all employees, leading to an increase in total training hours.

## 2. Human Rights Risk Management

Nanya Technology adopts the RBA standards for labor, health and safety, environment, and supply chain management, 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	Humane Rights Issues	Assessment Tools
 <p>Employee</p>	<p>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, Workplace Violation</p>	<ul style="list-style-type: none"> <li>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</li> </ul>
 <p>Supplier (Joint Venture)</p>	<p>Labor Rights, Occupational Health and Safety, Personal Data Protection, Workplace Violation</p> <hr/> <p>Responsible Minerals Procurement, Hazardous Substances Free</p>	<ul style="list-style-type: none"> <li>Supplier Audits, Third-Party Independent Verification</li> <li>Inspection Tools (CMRT/EMRT etc.), Due Diligence, Third-Party Independent Verification, Conformance (Testing) Report</li> </ul>
 <p>Community</p>	<p>Water Resource, Air Pollution, Noise, Traffic Issues</p>	<ul style="list-style-type: none"> <li>Government Regulations, Site Wastewater Discharge Quality Monitoring, Air Quality Monitoring, Noise Frequency Monitoring, Traffic Flows Assessment and Monitoring</li> </ul>
 <p>Customer</p>	<p>Personal Data Protection and Information Security</p>	<ul style="list-style-type: none"> <li>Annual Risk Assessment, Internal Audits and External Independent Verification</li> </ul>

## Mitigation and Compensation Measures for Material Human Rights Impacts

Subject	Material Human Rights Issues	2024 Mitigation Measures	2024 Compensation Measures
 <p>Employee</p>	Occupational Accident	<p><b>Occupational Safety and Health Management System</b></p> <ul style="list-style-type: none"> <li>• <b>Hazard Identification and Risk Assessment:</b> Regular and ad-hoc reviews of hazard identification and risk assessment results. We conducted a total of 38 internal audits in 2024, resulting in 11 corrective action requests.</li> <li>• <b>Proactive Risk Mitigation Measures:</b> 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 33 management plans were proposed in 2024.</li> <li>• <b>Regular Performance Assessment System:</b> Safety and health performance reviews conducted by each unit, environmental inspection proposals submitted by the Safety and Health Department and independent inspection proposals submitted by each department (independent inspection rate reached 96.3% in 2024, exceeding the annual goal of 93.9%).</li> </ul> <p><b>Promoting and Establishing Safety Culture</b></p> <ul style="list-style-type: none"> <li>• <b>Safety Walk and Talk (SWAT):</b> We conducted 48 Safety Walk and Talks, including on-site sessions led by executive-level managers and sessions with employees led by the Safety and Health Department, and department managers.</li> <li>• <b>Safety &amp; Environment Event Tracking System (SETS):</b> We had 1,555 cases of employee-initiated proposals for tracking and improving clean room environment deficiencies.</li> </ul>	<p><b>Contingency Response and Preparation</b></p> <ul style="list-style-type: none"> <li>• We have established the Contingency Procedures for Non-Conforming Situations, which outline contingency plans and include drills for high-risk units. A total of 58 sessions have been conducted.</li> <li>• 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.</li> </ul> <p><b>Accident Investigation and Constant Improvement</b></p> <ul style="list-style-type: none"> <li>• 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 2024, there were 21 near miss incidents. Our improvement efforts focused on liquid-related events (15 cases, accounting for 71.4%), such as preventing leaks from pipe connectors. Corresponding improvement and prevention measures were submitted accordingly.</li> <li>• 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.</li> </ul> <p><b>Compensation for Occupational Accidents</b></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
	Occupational Health Protection	<p><b>All Employees</b></p> <p>To enhance health management awareness, we organize the following health promotion activities:</p> <ul style="list-style-type: none"> <li>• Hosting at least one health promotion lecture per quarter. In 2024, we conducted 27 lectures, with a total of 1,528 participants.</li> <li>• Hosting annual weight-loss and quit-smoking pledge events, with a total of 478 participants.</li> <li>• Providing employees with relevant health information regularly (via posters and emails).</li> </ul> <p><b>Engineers:</b></p> <ul style="list-style-type: none"> <li>• Implementing programs for the prevention of diseases related to abnormal workloads.</li> <li>• Identifying and assessing high-risk groups.</li> <li>• Providing special health examinations as well as health management and promotion plans.</li> </ul>	<p><b>General compensation principles are as follows:</b></p> <ul style="list-style-type: none"> <li>• Employees with abnormal health examination results are continuously tracked and provided with ongoing health management. Regular medical consultations and health guidance are also provided.</li> <li>• An on-site clinic is established and doctor visits are arranged to provide professional medical and consulting services for employees.</li> </ul> <p><b>General compensation principles are as follows:</b></p> <ul style="list-style-type: none"> <li>• Arranging doctor appointments and providing health guidance.</li> <li>• Advising the department manager and further investigating the situation.</li> </ul>

Subject	Material Human Rights Issues	2024 Mitigation Measures	2024 Compensation Measures
 <p>Employee</p>	<p>Workplace Violation (Sexual Harassment)</p>	<p><b>The following preventive measures are in place to address workplace violations:</b></p> <ul style="list-style-type: none"> <li>• We've implemented training to prevent workplace violations, including bullying and sexual harassment, achieving a 100% completion rate in 2024.</li> <li>• We've 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.</li> </ul>	<p><b>1 Sexual Harassment Case in 2024</b>  <b>General compensation principles are as follows:</b></p> <ul style="list-style-type: none"> <li>• Implementing measures such as adjusting job duties or work environment as appropriate to prevent recurrence of workplace violation against the complainant.</li> <li>• Providing or referring the complainant to consultation, medical or psychological counseling, social welfare resources, and other necessary services.</li> <li>• 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.</li> <li>• We will continuously track, assess, and monitor substantiated cases to prevent future incidents of workplace violations.</li> <li>• 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.</li> </ul>
 <p>Supplier (Joint Venture)</p>	<p>Work Hours, Wage and Benefits, Humane Treatment, Workplace Violation</p>	<p><b>To ensure the suppliers' commitment to sustainability, we implement the following measures:</b></p> <ul style="list-style-type: none"> <li>• We conducted sustainability risk assessments for all Tier 1 suppliers, including Tier 1 suppliers of concern, encompassing a total of 370 suppliers with a 100% completion rate.</li> <li>• We enforced audits on high-risk suppliers, identifying a total of 61 non-conformances. Nanya Technology assists these suppliers for improvement, achieving a 100% remediation rate.</li> <li>• We evaluate potential impacts across supplier governance, social and environmental aspects, and continuously encourage suppliers to conduct risk management and identification measures.</li> <li>• 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 as well as preventing human rights violations. Please refer to Formosa Advanced Technologies' Sustainability Report for the disclosure of relevant due diligence findings. <a href="https://www.fatc.com.tw/esg/download.php">https://www.fatc.com.tw/esg/download.php</a></li> </ul>	<p><b>0 Human Rights Violations in 2024</b>  <b>General compensation principles are as follows:</b>                      Requiring suppliers to make improvements and comply with local regulatory requirements.</p>
	<p>Responsible Minerals Procurement, Hazardous Substances Free</p>	<p><b>Responsible Minerals Procurement Management</b></p> <ul style="list-style-type: none"> <li>• Monitoring evolving trends in the requirements of responsible mineral procurement management and developing a corresponding responsible mineral procurement management list.</li> <li>• Employing effective tools (CMRT/EMRT, etc.) to conduct regular due diligence.</li> <li>• Aiming for 0 deficiencies during third party independent verification.</li> </ul> <p><b>Hazardous Substance Free Management</b></p> <ul style="list-style-type: none"> <li>• Identifying the relevance of regulations to customer products and developing a corresponding hazardous substance management list.</li> <li>• Conducting regular due diligence and providing effective compliance (testing) reports.</li> <li>• Aiming for 0 deficiencies during third party independent verification.</li> </ul>	<p><b>0 Human Rights Violations and Hazardous Substances Incidents in 2024</b>  <b>General compensation principles are as follows:</b>                      Requiring suppliers to make improvements and comply with local regulatory requirements.</p>

Subject	Material Human Rights Issues	2024 Mitigation Measures	2024 Compensation Measures
 <b>Community</b>	<b>Air Pollution</b>	<p><b>Implementing the following measures to ensure environmental sustainability:</b></p> <p><b>(1) Discharging wastewater in compliance with regulatory standards and continuously reducing discharge volumes:</b></p> <p>A. Air Pollution Reduction: Reducing volatile organic compounds emission. According to third-party verification in 2024, the efficiency of our processing equipment is above 98%, resulting in a 70% reduction in volatile organic compounds emission compared to 2022.</p> <p>B. Water Resource Shortage:</p> <ul style="list-style-type: none"> <li>Diversifying Water Sources and Enhance Storage: We have constructed a water reservoir of 43,000 metric tons capacity and built 7 additional wells in our facilities, providing a combined daily water supply of 5,500 metric tons.</li> <li>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.</li> <li>Water Conservation and Rainwater/Wastewater Recycling: Beyond rainwater reuse initiatives, we recycled a total of 5,590,000 metric tons of wastewater in 2024.</li> <li>Establishing response measures aligned with government-issued water situation lights.</li> </ul> <p>C. Effluent Quality Control:</p> <ul style="list-style-type: none"> <li>Collected wastewater is classified and directed to the appropriate sewage facilities for treatment. Our treatment efficiency has improved over the years.</li> <li>We have established a real-time effluent quality monitoring system linked to the Environmental Protection Department of local government, enabling joint monitoring to ensure effluent quality remains within normal parameters.</li> </ul> <p><b>(2) We conduct monthly environmental inspections.</b></p> <p><b>(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.</b></p>	<p><b>0 Community Complaints in 2024</b></p> <p>General compensation principles are as follows:</p> <ul style="list-style-type: none"> <li>Paying close attention to the evolutions of regulations and adopting corresponding measures.</li> <li>Actively engaging with local schools, organizations, and groups to implement educational initiatives such as environmental conservation.</li> </ul>
	<b>Water Resource</b>	<p><b>We commit to engaging in public affairs and caring for the local communities, exerting social influence and promoting community development through the following measures:</b></p> <ul style="list-style-type: none"> <li>Talent Cultivation: We partner with schools to instill sustainability mindset in youths, promoting sustainability education to 1,536 students.</li> <li>Environmental Conservation: We connect with diverse non-profit organizations to promote environmental awareness, maintain biodiversity, and move towards a low-carbon society, with 523 employees participating in 4 environmental conservation events.</li> <li>Community Harmony: We participate in neighborhood (nearby community) public affairs to create a harmonious and mutually beneficial living environment, benefiting 16,671 people.</li> <li>Humanistic Care: We integrate local resources to characterize regional humanistic landscape, with 552 employees participating in cultural events in</li> </ul>	
	<b>Social Engagement</b>		<p><b>0 Information Breach Incidents in 2024</b></p> <p>General compensation principles are as follows:</p> <ul style="list-style-type: none"> <li>We will inform the customers immediately and provide proper remedies.</li> </ul>
 <b>Customer</b>	<b>Personal Data Protection and Information Security</b>	<p><b>We implement the following information security management measures to protect customers' rights:</b></p> <ul style="list-style-type: none"> <li>We established the Confidential Information Management Procedure and Personal Data Management Rules, requiring all employees to read.</li> <li>We conduct monthly information security awareness campaigns, and require employees to complete information security training courses and pass relevant assessments once every year to enhance personal data protection awareness. The completion rate was 100% in 2024.</li> <li>Company confidential information is archived in the Document Control Center in accordance with internal procedures and classified by confidentiality level. Unauthorized disclosure of company confidential information is prohibited, and relevant evaluation mechanisms are also established.</li> <li>We install metal detectors at entrances for inspecting information security-controlled items.</li> <li>We regularly apply for ISO 27001 international information security management certification.</li> </ul>	

Our risk occurrence rate in 2024 was 3.55%, a 0.23% reduction from 2023. This decrease resulted from the proactive organization of a wide range of health promotion events and seminars, along with regular health information sharing and awareness campaigns, ultimately enhancing our employees' focus on health management and providing them with helpful health knowledge. These initiatives covered topics such as nutritional diet, exercise, and psychological adaptation, enabling employees to better understand their physical conditions. Consequently, many have improved their health awareness, and we observed a significant decrease in abnormal health examination results and the number of employees with high workload.