

## 啓基科技反奴役制聲明

### ■ 我們的業務

啓基科技創立於 1996 年，專精於通訊產品的設計、研發與製造，提供包含 RF 天線設計、軟硬體設計、機構設計、系統整合、介面開發、產品測試與認證等完整的技術支援。全球總部位於臺灣新竹科學園區，在美國、英國、日本等地設有服務據點，在臺灣、中國、越南與墨西哥等地設有製造據點，提供全方位解決方案與在地支援。截至 2023 年 12 月底，臺灣地區共有 7,407 名員工（包含 1,783 名外籍員工與 16 名少數族群），中國地區共有 1,963 名員工（包含 16 名少數族群），越南地區共有 2,233 名員工（包含 629 名少數族群）。

### ■ 我們的政策

啓基致力於遵守最高的道德標準，並自發性支持並採用RBA行為準則（The RBA Code of Conduct，以下簡稱The RBA CoC），制訂有「啓基科技RBA行為準則」，作為全體同仁、關係企業以及供應商等關係人之遵循與規範，期許價值鏈中的所有夥伴都能共同遵循誠信經營原則，符合當地及國際法規要求，禁止與消除現代奴隸或人口販運，共同善盡企業公民責任。啓基相關的政策與行為準則如下：

- 啓基科技責任商業聯盟行為準則手冊
- [啓基科技責任商業聯盟行為準則承諾書](#)
- [啓基科技永續發展政策](#)
- [啓基科技永續發展實務守則](#)
- [啓基科技供應商行為準則](#)
- [啓基科技舉報與處理辦法](#)

我們要求所有供應商簽署供應商永續承諾聲明書，並需遵守啓基科技供應商行為準則，其中包含以下規定：

- 禁止強迫勞動
- 年輕勞工
- 不歧視/不騷擾/人道待遇
- 結社自由與集體談判
- 符合薪酬相關法規
- 健康與安全的工作環境

## ■ 我們的做法

### 風險評估

我們業務的主要風險，與我們雇用的外籍移工以及我們供應商的勞動力來源有關。

### 內部管理措施

啓基承諾遵守「聯合國世界人權宣言」、「聯合國全球盟約十項原則」、「國際勞工組織基本公約的核心勞動標準」、「聯合國工商企業與人權指導原則」與「RBA 行為準則」等相關國際規範，並遵循營運據點當地勞動法規、美國「2010 年加州供應鏈透明度法案」（California Transparency in Supply Chains Act of 2010）、英國「2015 年現代奴隸法」（UK Modern Slavery Act 2015）、澳洲「2018 年現代奴隸法」（Australia Modern Slavery Act 2018）與美國「2021 防止強迫維吾爾人勞動法」（Uyghur Forced Labor Prevention Act 2021）等國家法令，提供同仁良好工作條件與合理工時，不會要求同仁繳交身份證、護照或工作許可證，工作內容均尊重同任意願，所有同仁並依法擁有自由離職之權利。我們透過合法的外籍勞工人力仲介公司協助聘雇外籍勞工，並在他們到職前確定他們的僱傭條款和條件，員工可以自由接受或拒絕提供的任何職位。所有員工在入職前都會針對年齡與身分進行核實，以確保他們工作的資格。我們支付的薪資符合所有營運國家的薪酬相關法令。我們也以同樣的標準要求供應商，並透過稽核來確認。

### 外部管理措施

在考量新的供應商時，我們會進行盡職調查，並定期審查既有的供應商。我們和供應商密切合作，深入了解他們的生產過程，並與所有與我們有業務往來的供應商簽署相關合約與我們的供應商永續承諾聲明書，包括零組件供應商、服務類供應商及外籍勞工仲介公司。臺灣總部、中國製造據點與越南製造據點的員工也定期拜訪與稽核我們的主要供應商。這讓我們更能掌握供應商的工作情況與工作流程，也讓我們有機會發現可能出現現代奴隸問題與人口販運風險的地方。

### 供應商 RBA 稽核

啓基自 2013 年起展開供應商 CSR 稽核計畫，2017 年起改為 RBA 稽核計畫，我們將不同類型的主要供應商依其在勞工、道德、健康與安全、環境與管理系統等議題的風險程度，劃分為 A（高度風險）、B（中度風險）與 C（低風險）三個群組，每年挑選約 50 家高風險之供應商，由富有經驗的稽核員進行 RBA 稽核。我們分析稽核結果，並推動供應商實施矯正行動計畫，若供應商沒有進行適當的矯正行動計畫，或嚴重違反我們的行為準則，造成啓基或其客戶之直接損失或間接影響，除了要求供應商承擔賠償責任，亦會影響合作關係，要求各供應商務必確實遵守。

截至 2023 年底，一階與關鍵供應商簽署「供應商永續承諾聲明書」佔所有一階與關鍵供應商家數的 94.1%，且 51 家供應商完成 RBA 實地稽核，未發現有現代奴隸或人口販運之情形。

### 責任礦產管理

啓基未直接採購金屬原料，亦宣告責任礦產政策聲明，並支持責任商業聯盟（RBA）及全球電子可持續發展倡議組織（Global e-Sustainability Initiative, GeSI）所合作發起的責任礦產倡議（Responsible Minerals Initiative, RMI），自 2010 年起，採用其製訂的衝突礦物報告模板（Conflict Minerals Reporting Template, CMRT），定期每年進行供應商衝突礦產調查，要求供應商避免使用來自衝突地區的非法礦產，並鼓勵供應商協助其尚未參與 RMAP（Responsible Minerals Assurance Process, RMAP）的合作冶煉廠參與該計畫，成為 RMAP 的合格冶煉廠。

### 訓練

所有新入職的員工都需接受「ESG & RBA 新人訓練」線上教育課程，全體員工則每年需定期接受「ESG & RBA 全員訓練」線上課程。全球資材處業務關聯同仁接受「永續採購課程」，供應商稽核人員皆須接受「RBA 二方驗廠人員訓練」課程，而供應商也須接受「供應商 RBA 教育訓練」課程。

### 舉報

啓基設有公開的「利害關係人信箱 [public@wnc.com.tw](mailto:public@wnc.com.tw)」、「檢舉不法信箱 [wnc.integrity@wnc.com.tw](mailto:wnc.integrity@wnc.com.tw)」與「職場不法侵害及性騷擾申訴信箱 [8585@wnc.com.tw](mailto:8585@wnc.com.tw)」，供所有利害關係人對啓基提問、建議或進行申訴與舉發。

「WNC 舉報與處理辦法」明訂檢舉不法之舉報處理程序與作業辦法，並由誠信調查室成立專案小組負責受理舉報與調查相關事項，啓基確保舉報人身份保密且防範相關組織或牽涉人員可能之報復，除非有不法行為，啓基不因員工舉報而予以解雇、調職或其他不利處置。



Jeffrey Gau  
總經理暨執行長  
2024 年 07 月

## WNC Modern Slavery Statement

### ■ Our Business

Wistron NeWeb Corporation (hereinafter referred to as WNC), established in 1996, specializes in the design, development, and manufacturing of communications products. We provide comprehensive technical support for RF antenna design, software and hardware design, mechanical design, system integration, interface development, product testing and certification. Headquartered in Taiwan's Hsinchu Science Park, WNC has also established overseas service locations in the USA, the UK, and Japan, and built manufacturing facilities in Taiwan, China, Vietnam, and Mexico. These sites offer complete solutions and local support for customers worldwide. As of the end of December 2023, WNC's sites in Taiwan employed around 7,407 people (including 1,783 migrant workers); in China, there were a total of 1,963 employees, and in Vietnam, approximately 2,233.

### ■ Our Policies

WNC is committed to upholding the highest ethical standards and voluntarily abides by the Responsible Business Alliance (RBA) Code of Conduct. The company has adopted its own code of conduct, the WNC Responsible Business Alliance (RBA) Code of Conduct, for all employees, affiliated companies, and suppliers to follow. It clearly states WNC's policy for upholding human rights by expressly barring and eradicating modern slavery or human trafficking within our operations and supply chains. WNC's business principles and supplier code of conduct are further detailed below:

- WNC RBA Code of Conduct
- [WNC Commitment to the RBA Code of Conduct](#)
- [WNC Sustainable Development Policy](#)
- [WNC Sustainable Development Best Practice Principles](#)
- [WNC Supplier Code of Conduct](#)
- [WNC Irregularity Reporting and Handling Procedure](#)

We require all suppliers to sign the Supplier Commitment to Sustainability Declaration and follow the WNC Supplier Code of Conduct, which includes the following conditions:

- Prohibition of forced labor
- Restrictions on use of young workers
- Non-discrimination/non-harassment/humane treatment
- Freedom of association and collective bargaining

- Compliance with all applicable wage laws
- A healthy and safe working environment

## ■ **Our Approach**

### **Risk assessment**

The primary risks for our business are associated with the migrant workers we employ in Taiwan and the labor sources of our suppliers.

### **Internal Management Measures**

All WNC sites follow international standards and local regulations, including the UN Universal Declaration of Human Rights, the Ten Principles of the UN Global Compact, the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the RBA Code of Conduct. We abide by local labor laws and comply with the California Transparency in Supply Chains Act of 2010, the Modern Slavery Act of 2015 of the UK, the Modern Slavery Act 2018 of Australia, and the Uyghur Forced Labor Prevention Act 2021 of the US. WNC maintains good working conditions and schedules reasonable working hours. We do not require employees to hand over ID cards, passports or work permits; We respect the wishes of employees in terms of the content of the work, and all employees have the right to leave their jobs freely in accordance with the law. WNC hires migrant workers via foreign labor agents that hold business registration certificates. Hiring terms and conditions are clearly defined in job offers before employees report for work, and they may freely choose to accept or reject any job offer. Prior to reporting to work, all employees are subject to age and identity verification to ensure their work rights. The salaries we pay employees are compliant with relevant regulations on remuneration in the countries where we operate. We also set the same requirements for our suppliers and ensure their conformance through audits.

### **External Management Measures**

We conduct due diligence when considering new suppliers and regularly review performance of existing suppliers. We work closely with our suppliers to understand their production processes and require all suppliers that we work with, including component suppliers, service suppliers and migrant worker recruiters, to sign a contract and the WNC Supplier Commitment to Sustainability Declaration. Employees from our Taiwan Headquarters, China sites and Vietnam site also regularly visit and audit major suppliers,

allowing us to understand these suppliers' working status and processes, and to spot any potential signs of modern slavery and human trafficking.

### **RBA Audit Processes for Suppliers**

In 2013, WNC officially launched its supplier CSR audit program, which was changed to the RBA Audit Program in 2017. Based on this program, major suppliers are divided into categories: A) high risk, B) moderate risk, and C) low risk, according to the level of risk they exhibit in aspects of labor, ethics, health and safety, environment and management systems. Each year we select approximately 50 suppliers that are identified as high risk and send auditors to conduct RBA audits. We then analyze the audit results and require that our suppliers implement corrective action plans. If a supplier fails to implement appropriate corrective action plans or severely violates our code of conduct, resulting in direct losses or indirect impact to WNC or its customers, said supplier will be held liable for compensation. As of the end of 2023, the number of Tier-1 Suppliers and Critical Suppliers who have signed the Supplier Commitment to Sustainability Declaration and the Supplier Integrity Commitment Letter accounted for 94.1% of all suppliers. Additionally, 51 suppliers have completed RBA audits, with no cases of modern slavery or human trafficking found.

### **Responsible Minerals Management**

WNC is not involved in the direct purchase of metals, and has issued a Responsible Minerals Policy Statement. WNC supports the Responsible Minerals Initiative (RMI) that was initiated by the RBA and the GeSI (Global e-Sustainability Initiative); has adopted the Conflict Minerals Reporting Template (CMRT) stipulated by them to conduct conflict mineral investigation for suppliers since 2010; and requests suppliers to avoid using illegal minerals from areas of conflict. WNC investigates whether smelters associated with our suppliers participate in the RMAP (Responsible Minerals Assurance Process) through CMRT and encourages suppliers to assist those smelters that have not participated in RMAP to become qualified smelters in accordance with RMAP stipulations.

### **Training**

All employees at WNC must complete a mandatory ESG & RBA training for new employees online course, and all employees must take the ESG & RBA training for all employees online course annually. Staff from the Global Supply Chain Management Div. receive Sustainable Procurement training; supply chain auditors must receive the supply chain RBA audit training, and suppliers take RBA online training.

## **Reporting**

WNC has established a stakeholder e-mail [public@wnc.com.tw](mailto:public@wnc.com.tw), an e-mail for reporting violations [wnc.integrity@wnc.com.tw](mailto:wnc.integrity@wnc.com.tw) and an e-mail to report workplace harassment and bullying [8585@wnc.com.tw](mailto:8585@wnc.com.tw). The WNC Reporting and Handling Procedure stipulates handling procedures and operations to address violations. The Integrity Office is tasked with establishing a task force to handle reports and perform investigations. WNC ensures that the identities of the reporting parties are kept secret and that they are not open to retaliation. WNC will not terminate or transfer any employee or cause any other unfavorable result due to their reporting an issue unless the employee has violated the law.



Jeffrey Gau  
President and CEO  
July 2024