

## 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.



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