

台灣大哥大人權風險及盡職調查 Taiwan Mobile Due Diligence Report 2025

*台灣大哥大實施人權減緩措施的據點數量：668（含台灣大哥大及子公司等9家公司，以及台灣大哥大366家直營店、293家經銷據點）

Taiwan Mobile implemented the number of sites with Human Rights mitigation measures: 669 (including TWM and 9 subsidiaries, as well as 366 direct stores and 293 franchise stores).

* 今年台灣大哥大各項人權指標皆落在「影響程度高，而發生機率與脆弱度低」的象限範圍內。

2025, Taiwan Mobile's results of the questionnaire, overall, all Human Rights indicators fall within the quadrant of "High severity, but with relatively low likelihood and low vulnerability."

Value Chain：Own Operations

● 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 減緩措施	Remediation Action 補救措施	Risk level	2025 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			
J1	人身自由與安全	在公司遭受暴力(如肢體、言詞或精神暴力)、脅迫或恐嚇等	- 為宣示公司對於工作場所因職務遭受不法侵害之重視，由總經理簽署「禁止工作場所不法侵害聲明」並公告。 - 於聲明中公告職場不法侵害申訴管道，並透過系統，將申訴文件以電子表單方式提交，提升處理效率。 - 定期執行職場不法侵害預防之危害辨識及風險評估和監測。 - 辦理職場不法侵害預防相關教育訓練課程。	- 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。 - 依申訴者需求，提供內、外部諮詢及心理輔導等資源。 - 配合法令或相關指引，持續修正「執行職務遭受不法侵害預防標準作業程序」，確保其有效性與符合性。 - 遴選案件之調查及處理人員時，須非屬案件之利害關係者，以確保結果都能公平公正。	重要風險	100%	0%	100%	勞安	2025 100%案件妥善處理。 2026 目標: 100%案件妥善處理。	- 禁止工作場所職場不法侵害聲明(內部管理文件) - 執行職務遭受不法侵害預防標準作業程序(內部管理文件)https://twm/portal-web/#/pages/communication-board/41/bulletin/ABL0000?typeId=71&menuId=10859
J1	Personal Freedom and Safety	Violence(such as physical, verbal or emotional violence), coercion or intimidation in the workplace.	- The General Manager was sign and publicly announce the "Declaration Against Workplace Unlawful Acts." - complaint documents electronically via the system to enhance processing efficiency. - Hazard risk identification and risk assessment monitoring for Unlawful Infringement in the Workplace. - Strengthen education and training, and provide illegal infringement prevention courses.	- Investigate complaints according to the handling and investigation procedures for unlawful infringement incidents in the performance of duties. - Provide internal and external counseling, psychological support, and other resources based on the complainant's needs. - Continuously revise operational procedures in accordance with regulations or relevant guidelines to ensure their	Major risk	100%	0%	100%	Labor Safety & Health	2025 100% of cases properly handled 2026 Goal: 100% of cases properly handled	- Policy Statement on Prevention of Unlawful Workplace Infringement. (Internal management document) - Standard Operating Procedure for Preventing Unlawful Assaults While Performing Duties.(Internal management

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				effectiveness and compliance. ● When selecting personnel to investigate and handle cases, they must not be parties with a vested interest in the case to ensure that all outcomes are fair and impartial.							document) https://twm/portal-web/#/pages/communication-board/41/bulletin/ABL0000?typeld=71&menuld=10859
H1	強迫勞動	公司未能遵循法定規範 (如休息時間...等), 讓同仁未獲適當的休息, 進而造成同仁身心的影響	● 若政府有制定或修訂法令, 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。 ● 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。	● 若發生不符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。 ● 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, 可自行選擇申請補休或加班費。	重要風險	100%	0%	100%	HR	● 2025 目標: 100%遵循法定要求及零強迫勞動事件 ● 2025 達成: 100% ● 2026 目標: 100%遵循法定要求及零強迫勞動事件	● https://english.taiwanmobile.com/esg/humanRights.html
H1	Forced or Compulsory Labor	The company failed to comply with legal regulations (such as rest time, etc.), so that colleagues did not get proper rest, which in turn affected their physical and mental health.	● If any labor law is enacted or amended, we will comprehensively review the company's rules/ regulations and working conditions of employees to ensure that all of them meet statutory requirements. ● The company's attendance management policy clearly defines regular working hours, maximum overtime hours and consent of an employee for overtime work. ● When employees request overtime, the system monitors and ensures that total overtime hours do not exceed the maximum limit.	● If a compliance breach occurs, we will immediately revise according to statutory requirements and establish a mechanism to prevent recurrence. ● 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%	100%	HR	● 2025 Goal: 100% compliance with laws & zero forced labor. ● 2025 Goal Achievement Rating: 100% ● 2026 target is 100% compliance with laws & zero forced labor.	● https://english.taiwanmobile.com/esg/humanRights.html
E2	職場健康	在公司已採取『辦公室防疫管理暨員工自主應變指引』的防疫措施下, 公司內仍群聚染疫	● 訂定及公告「疫後健康新生活措施」指引。 ● 定期發送傳染病防治及自我健康管理宣導電子報, 提升員工防疫意識。 ● 已建置「健康管理系統」, 提供員工體溫回報機制。	● 根據疫情發展及政府相關規範更新, 適時調整健康管理政策與「健康管理系統」, 確保其有效性與符合性。	重要風險	100%	0%	100%	勞安	● 2025 100%案件妥善處理 ● 2026 目標: 100%案件妥善處理	● 疫後健康新生活 (內部文件) https://twm/portal-web/#/pages/org/18/dept-rule/ABL0000?comld=1&typeld=13&menuld=10132
E2	Workplace Health	Although the company has adopted the	● Develop and publish guidelines for "Post-Pandemic Healthy Living Measures." ● Regularly distribute newsletters on	● Adjust health management policies and the 'Health Management System' as needed	Major risk	100%	0%	100%	Labor Safet	● 2025 100% of cases properly handled ● 2026 Goal: 100% of cases	● Post-Pandemic Healthy Living Measures(Internal

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		epidemic prevention measures of “Office Epidemic Prevention Management and Employee Self-Response Guidelines”, there are still clusters of infections in the company.	infectious disease prevention and self-health management to enhance employees' awareness of health and safety. Implemented the "Health Management System," which allows employees to report their body temperature.	in response to infectious disease developments and government regulation updates to ensure effectiveness and compliance.					y & Health	properly handled	Document): https://twm/portal-web/#/pages/org/18/dept-rule/ABL0000?comId=1&typeId=13&menuId=10132

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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C1	孩童保護	公司提供之產品或服務，未依法令分級或提供適當的兒少保護措施(如針對兒童/青少年上網瀏覽阻擋不當資訊等)	● 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「上網管家」服務，針對兒童/青少年上網時間管控，保護兒少降低網路成癮。	● 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。	重要風險	100%	0%	100%	CBG	● Y25 申訴件 0 件。 ● Y26 目標：0 申訴件	守護兒少上網安全： https://corp.taiwanmobile.com/esg/productServiceObligations.html
C1	Child Protection	The products or services provided by the company do not comply with the law to classify or provide appropriate child protection measures (such as blocking inappropriate information for children/teens browsing the Internet, etc.).	● 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. ● Provides its subscribers with the "Internet Guardian" service to support responsible digital usage among children and adolescents by enabling internet usage time management, thereby promoting digital well-being and reducing the risk of internet addiction among minors.	● 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.	Major risk	100%	0%	100%	CBG	● 2025: 0 complaint. ● 2026 target: 0 complaint.	Safeguarding Internet use for children and youth: https://english.taiwanmobile.com/esg/productServiceObligations.html

Value Chain： Downstream (Products/services) – Local communities

● 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, [communities] 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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N1	社區居住品質	公司營業活動未採行可降低溫室氣體排放作為(如節水、節能減碳措施)，或未依法採取防止環境污染管理(如資源回收或事業廢棄物措施)，對社區環境產生負面影響	● 2023 年董事會修訂通過「環境暨能源政策」為管理指引，並以環境管理系統 ISO14001 規範為基礎，定期檢視自身營運據點、供應商、對環境管理政策和環境影響認知的措施。 ● 制定「環境管理手冊」，定期對內部維運及供應商進行環境管理體系的全面檢核與驗證，以確保符合法規，持續減低社區居住品質影響。 ● 每年執行溫室氣體盤查及揭露排放量，經過第三方單位驗證確信，並制定溫室氣體排放減量策略與目標，以定期檢視執行成效。	● 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%	100%	TG	● 2025:0 件申訴 ● 2026 目標:0 件申訴	● 環境暨能源政策: https://english.taiwanmobile.com/esg/environmentalAndEnergyPolicy.html
N1	Local communities Living Quality	The company's business activities do not take actions that can reduce greenhouse gas emissions (such as water conservation, energy conservation and carbon reduction measures), or fail to take legal measures to prevent environmental pollution (such as resource recycling or business waste measures), which has a negative impact on the community environment.	● Environmental policy revision approved by Board of Directors in 2023, and use this policy as a management guide. Based on the ISO14001 specifications of the environmental management system, we regularly review our business bases, suppliers, and measures to understand environmental management policies and environmental impacts. ● Develop an “Environmental Management Manual”, conduct a comprehensive review of the environmental management system for internal operations and suppliers, and conduct regular inspections and verifications to ensure compliance with laws and continue to reduce the impact on community living quality. ● Greenhouse gas inventory and emissions disclosure are conducted annually, verified by third-party organizations, and greenhouse gas emission reduction strategies and targets are developed to regularly review the effectiveness of implementation.	● Provide channels and mechanisms for complaints regarding risks of human rights harms to community living quality, with a grievance hotline: 0809-000-852 / 02-66062999.	Major risk	100%	0%	100%	TG	● 2025 0 complaint. ● 2026 Goal: Zero.	● Environmental and Energy Policy: https://english.taiwanmobile.com/esg/environmentalAndEnergyPolicy.html

Value Chain : Upstream – Suppliers 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 [Suppliers] due diligence are: third-party employees, children, indigenous people, migrant workers, people with disabilities

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G1	工作與勞動條件保障	供應商在勞動條件方面，未遵循法定要求，以致同仁基本工作權利(如勞健保勞退投保、基本薪資、法定休假、加班..等)無法被充份保障	● 要求供應商需訂定基本的勞工保障政策，內容包括但不限於工資、工時、健康安全、權益照顧措施，且不得低於勞基法之要求；進階則為要求建立勞動條件壓力指標，例如加班率、簽約與實際工時差距、工資支付準確性統計等。 ● 台哥大定期檢視供應商行為準則是否與國際、當地法規接軌，明確規定工資、工時、健康安全、勞動契約等最低標準，並要求供應商遵守。 ● 每年定期進行 1 次供應商 ESG 盡職調查，問卷內容需包含勞工保障政策、作為以及勞資溝通制度，並納入移工相關問題，如供應商是否有定期稽核仲介單位、檢視移工環境等等，檢視供應商執行情況。	● 若被列為人權高風險廠商，要求供應商說明違法/不合規的原由，並提出具體改善行動，台哥大定期追蹤改善進度。	重要風險	93.7%	0%	100%	採購	● F26 重大供應商 0 家人權議題高風險	
G1	Guarantee of Job and Labor Conditions	The supplier did not comply with legal requirements in terms of labor conditions, resulting in the inability to fully protect the basic work rights of employees (such as labor insurance, health insurance, retirement insurance, basic salary, statutory holidays, overtime, etc.).	● Suppliers are required to establish basic labor protection policies, including but not limited to wages, working hours, occupational health and safety, and employee welfare measures, with standards no lower than those stipulated by the Labor Standards Act. At an advanced level, suppliers are further required to establish labor condition stress indicators, such as overtime rates, gaps between contracted and actual working hours, and statistics on wage payment accuracy. ● Taiwan Mobile regularly reviews its Supplier Code of Conduct to ensure alignment with international and local regulations. The Code clearly defines minimum standards for wages, working hours, health and safety, and labor contracts, requiring suppliers to comply. ● Conduct a supplier ESG due diligence	● For suppliers identified as high-risk in human rights, require them to explain the reasons for non-compliance or violations and propose concrete corrective actions. Taiwan Mobile will regularly monitor the progress of these improvements.	Major risk	93.7%	0%	100%	procurement	● FY26 aiming zero finding with significant suppliers with high-risk in human rights.	

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			assessment once a year. The questionnaire shall cover labor protection policies, practices, and labor–management communication mechanisms, and shall also include migrant worker–related topics, such as whether suppliers regularly audit labor brokers and review migrant workers’ working and living conditions, in order to assess suppliers’ implementation status.								
H1	強迫勞動	供應商未能遵循法定規範(如休息時間…等)，讓同仁未獲適當的休息，進而造成同仁身心的影響	● 要求供應商設立申訴與舉報機制，讓內部員工可反應違規問題，如不合理工資、過長工時、健康安全等，確保舉報人不會因為申訴而遭受報復，並制定調查與處理機制。 ● 要求供應商制定並落實「無強迫勞動政策」，明確禁止強迫勞動、超時工作、非法人口販賣等行為。 ● 對供應商進行人權議題宣導與教育訓練。 ● 每年定期進行 1 次供應商 ESG 盡職調查，檢視供應商執行現況與法律遵循情形。 ● 整合國際強迫勞動框架，供應商政策需參考 ILO 強迫勞動定義與美國 UFLPA、EU CSDDD 等實務要求。 ● 供應商勞動政策除工時／薪資外，亦需納入身心健康指標，增加心理健康、疲勞管理、病假不懲罰條款。	● 若供應商涉及強迫勞動或人口販運，要求立即停止不當行為並提出具體改善計畫，若供應商在特定議題上持續被列為高風險者，台灣大將對此供應商採取暫停或終止合作關係，詳細流程與做法請參考《供應商作業規範及記點規則辦法》(https://twmepmall.taiwanmobile.com/esp/index)。 ● 應註記海外分廠及遠端供應商合規責任，不以「未到場查核」為理由免責。	重要風險	93.7%	0%	100%	採購	● F26 重大供應商 0 家人權議題高風險	
H1	Forced or Compulsory Labor	The supplier failed to comply with legal regulations (such as rest time, etc.), so that colleagues did	● Suppliers are required to set up a grievance and whistleblowing mechanism, allowing internal employees to report violations such as unreasonable wages, excessive working hours, and health and safety issues. Suppliers must ensure that whistleblowers are protected from	● If a supplier is involved in forced labor or human trafficking, the supplier is required to immediately cease the improper practices and submit a concrete corrective action plan. If a supplier continues to be	Major risk	93.7%	0%	100%	procurement	● FY26 aiming zero finding with significant suppliers with high-risk in human rights.	

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		not get proper rest, which in turn affected their physical and mental health.	retaliation and establish procedures for investigation and resolution. - Suppliers are required to establish and implement a “No Forced Labor Policy,” explicitly prohibiting forced labor, excessive working hours, and human trafficking. - Conduct awareness and training programs for suppliers on human rights issues. - Conduct an annual supplier ESG due diligence assessment to evaluate their implementation status and legal compliance. - Supplier policies integrate international forced labor frameworks by referencing the International Labour Organization (ILO) definition of forced labor, the U.S. Uyghur Forced Labor Prevention Act (UFLPA), and the EU Corporate Sustainability Due Diligence Directive (CSDDD). - Worker well-being indicators are incorporated into supplier policies, extending beyond working hours and wages to include mental health support, fatigue management, and non-punitive sick leave provisions.	classified as high risk for specific issues, TWM will suspend or terminate the business relationship with the supplier. For detailed procedures and implementation measures, please refer to the Supplier Operating Guidelines and Demerit Point Rules: https://twmepmall.taiwanmobile.com/esp/index . Compliance responsibilities extend to overseas manufacturing sites and remote suppliers and cannot be exempted on the grounds that on-site audits were not conducted.							