



ENNOCONN CORPORATION

2025 Human Rights Risk Identification and Due Diligence

June 24, 2026

Human Rights Issue Identification and Commitment

Background: Since 2024, Ennoconn has launched a human rights due diligence process and incorporated it as a key method for promoting sustainable management. The process is conducted annually, with the next survey scheduled for 2027.

Scope: The survey process covers Ennoconn's own operations.

Frequency: In accordance with international human rights conventions, including the Universal Declaration of Human Rights, the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights (UNGPs), and the ILO Declaration on Fundamental Principles and Rights at Work, Ennoconn is committed to preventing any infringement or violation of human rights and regularly reviews its human rights management status based on the guidance of these frameworks. Ennoconn conducts due diligence annually to identify material human rights issues, review management performance, develop improvement plans, and publicly disclose its due diligence report.

Assessment respondents: Section-level and above managers across Ennoconn's functional departments serve as the representative population.

10 Major Human Rights Issues	
Forced Labor	Child Labor Protection
Working Hours	Grievance Channels
Compensation	Privacy and Personal Data Protection
Diversity & Inclusion, Anti-discrimination, and Anti-harassment	Just Transition and Right to Employment Security
Human Trafficking	Occupational Health and Safety

- **Based on the UN Guiding Principles on Business and Human Rights, Ennoconn established a list of potential human rights issues.**
- **The list was supplemented according to Ennoconn’s areas of concern and used for human rights due diligence.**

Human Rights Risk Identification Checklist

Issue	Description	Likelihood				
		Very Low 1 point	Low 2 points	Medium 3 points	High 4 points	Very High 5 points
Forced Labor	Forced labor risk (e.g., coercion, slavery, or retention of identity documents): The risk of potential violations in daily management or recruitment, such as forced labor, debt bondage, withholding identity documents or wages, or obstructing resignation procedures and deliberately creating barriers that compel employees to remain against their will.					
Working Hours	Excessive working hours risk (e.g., overtime exceeding limits or failure to provide statutory rest): The risk that the Company may not comply with statutory working-hour limits of 8–12 hours per day and 46–54 hours per month, may not ensure at least one statutory rest day every six days, may not fully implement voluntary overtime principles, or may lack attendance-based overtime alerts and management controls.					
Compensation	Compensation dispute risk (e.g., overtime-pay calculation not compliant with regulations, or wages not paid in full and on time): Potential irregularities in payroll calculation or payment, including actual wages and overtime pay not meeting statutory standards, delayed wage payment, insufficient wage-statement transparency, or unlawful punitive deductions.					
Diversity & Inclusion, Anti-discrimination, and Anti-harassment	Discrimination and harassment risk (e.g., unequal treatment based on gender/age, workplace harassment, or verbal abuse): The risk that recruitment, compensation, and promotion may involve unequal treatment due to gender, race, religion, age, pregnancy, disability, or other diverse backgrounds, or that workplace harassment, verbal abuse, corporal punishment, psychological pressure, or other unlawful harm may prevent employees from enjoying core labor protections.					
Human Trafficking	Human trafficking risk (e.g., recruitment channels involving illegal trafficking or improper recruitment fees charged to workers): Potential gaps related to modern slavery in recruitment and employment, including illegal trafficking practices or improper recruitment fees charged to workers.					

Human Rights Risk Identification Checklist

Issue	Description	Likelihood				
		Very Low 1 point	Low 2 points	Medium 3 points	High 4 points	Very High 5 points
Child Labor Protection	Child and young worker non-compliance risk (e.g., accidental hiring of child labor, or assigning young workers to hazardous or night work): The risk that identity verification or job assignment may result in accidental hiring of workers below the legal working age, or that restrictions on night work and hazardous or heavy work for workers aged 16–18 may not be properly implemented, thereby infringing labor rights.					
Grievance Channels	Grievance mechanism failure risk (e.g., inaccessible channels, lack of confidentiality, retaliation against complainants, or mishandling of cases): The risk that current grievance mechanisms may lack confidentiality or anonymity, complainants may face retaliation, or employees and external stakeholders may not receive independent acceptance, objective investigation, and timely response for their concerns.					
Privacy and Personal Data Protection	Privacy and personal data leakage risk (e.g., leakage of employee or customer personal data, or improper collection or use): Potential control gaps in information security or daily operations, such as unlawful collection, processing, or use of employee and customer personal data, or data leakage caused by insufficient safeguards that infringes personal privacy rights.					
Just Transition and Employment Security	Employment impact risk from transition (e.g., insufficient training amid automation/AI transformation and impacts on the right to work): The potential risk that, during digital or AI transformation, insufficient skills training may cause new technologies to affect employees' right to work and sustainable career development, or create gaps in employment security.					
Occupational Health and Safety	Occupational safety and health risk (e.g., occupational injuries, non-compliant working environments, or failure to conduct health checks): The risk that office or plant areas may have safety and health conditions not meeting statutory standards, inadequate prevention of occupational injuries, lack of regular health examinations, or incomplete hazardous-work risk assessments that endanger employees' physical and mental health and life safety.					

Risk Identification Process and Assessment Respondents

Procedure



Process

Policy Framework <ul style="list-style-type: none"> • Human Rights Policy • UDHR / UNGC / UNGPs • ILO Principles • RBA Code 	Respondents Section-level and above managers across functions	Risk Issues 10 human rights topics: labor, safety, privacy, grievance, transition, and others	Assessment Evaluate risk topics and calculate risk coefficients based on survey results	Mitigation Remedial actions and implementation results	Monitoring Set regular survey timing by respondent group
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Risk Identification Respondents and Questionnaire Distribution

Target Group	Identified Stakeholder Group	Responsible Unit	Questionnaire Distribution
Ennoconn Standalone Entity	Section-level and above managers across functional departments	HR	<p>It is recommended to target 100% coverage for the human rights questionnaire survey. The assessment may:</p> <p>Use section-level and above managers across functional departments as representative respondents to comprehensively evaluate and review potential human rights risks and impacts in Ennoconn's own operations.</p> <p>Use section-level and above managers across functional departments as the representative population; under this approach, 100% coverage can be claimed through a questionnaire survey.</p>

Survey Method

With reference to UN and relevant international human rights issues, Ennoconn identified a list of human rights risks related to stakeholders. The 10 risks are: 1) Forced Labor, 2) Working Hours, 3) Compensation, 4) Diversity & Inclusion, Anti-discrimination, and Anti-harassment, 5) Human Trafficking, 6) Child Labor Protection, 7) Grievance Channels, 8) Privacy and Personal Data Protection, 9) Just Transition and Right to Employment Security, and 10) Occupational Health and Safety.

Likelihood / Probability: qualitative or quantitative rating on a 1–5 scale.

Likelihood				
Level	Severity Category	Qualitative Description	Quantitative Description	Quantitative Description
1	Very Low	Generally not expected to occur	<10%	Less than once per year
2	Low	Occurs only in rare cases	10%~30%	At least once every six months
3	Medium	May occur under certain circumstances	30%~70%	At least once per quarter
4	High	Occurs in many circumstances	70%~90%	At least once per month
5	Very High	Occurs frequently	>90%	At least once per week

Severity / Degree: Select the scale based on the nature of the issue (impact, scope, and remediability), rated 1–5.

Severity				
Level	Severity Category	Impact Description	Scope Description	Remediability
1	Minimal	Negligible impact on physical and mental health and safety	No adverse impact on stakeholders	Can be restored or impact eliminated within 1 year
2	Minor	Minor impact on physical and mental health and safety: minor injury or illness without lost time	Affects some stakeholders within a specific stakeholder group	Requires 1–3 years to restore or eliminate impact
3	Medium	Moderate impact on physical and mental health and safety: minor injury or illness with lost time	Affects most stakeholders within a specific stakeholder group	Requires 3–5 years to restore or eliminate impact
4	Major	Severe impact on physical and mental health and safety: resulting in disability	Affects most stakeholders	Requires 5–10 years to restore or eliminate impact
5	Critical	Severe impact on physical and mental health and safety: resulting in death	Affects all stakeholder groups (community, employees, suppliers, etc.)	Unlikely to be restored or impact eliminated

Respondents / Coverage

- 50 section-level and above managers represented 205 employees.
- 50 valid responses were collected; response rate: 100%.
- Survey coverage reached 100%.
- Distributed once via Google Forms.
- Responded representatives: 50; non-responded: 0.
- Representation ratio: $50/50 \times 100\% = 100\%$.



Questionnaire Response

Function	Expected	Returned	Coverage
Board Office	5	5	100%
General Manager Office	2	2	100%
IT	5	5	100%
Operations	11	11	100%
Product Marketing	4	4	100%
R&D	10	10	100%
Sales	4	4	100%
Finance	6	6	100%
Business Management	1	1	100%
Administration	2	2	100%
Total	50	50	100%

Human Rights Due Diligence Sample Description – Female Employees

Respondents / Coverage

- 14 section-level and above managers represented 85 female employees.
- 14 valid responses were collected; response rate: 100%.
- Survey coverage reached 100%.
- Distributed once via Google Forms.
- Responded representatives: 14; non-responded: 0.
- Representation ratio: $14/14 \times 100\% = 100\%$.

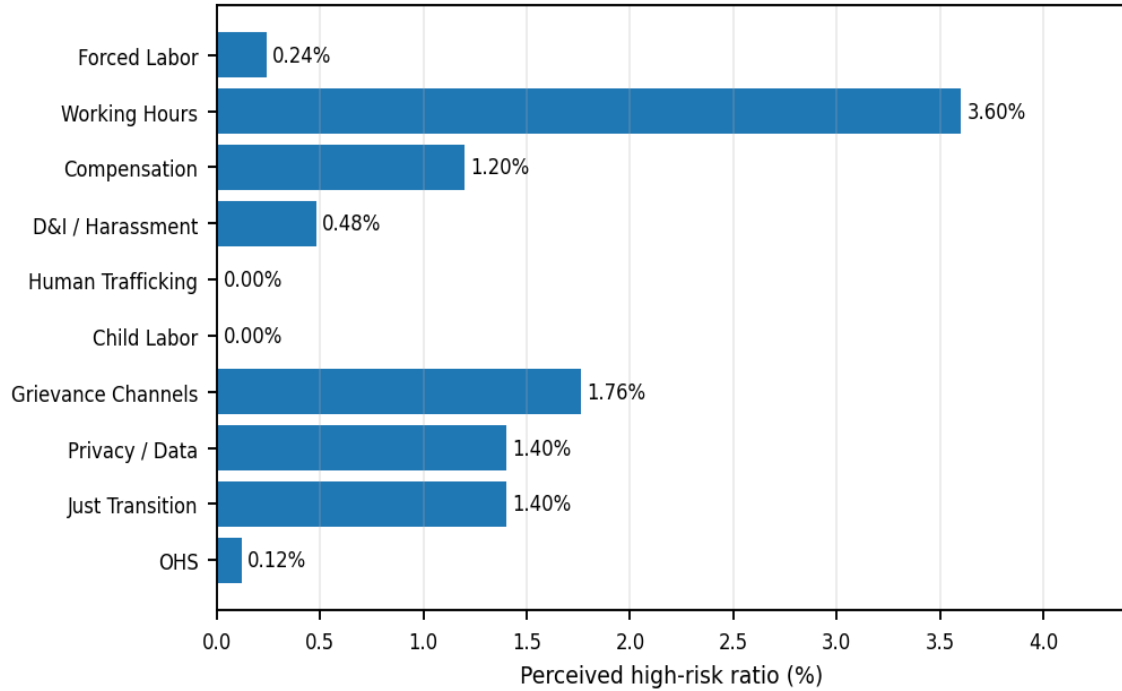
Questionnaire Response

Function	Expected	Returned	Coverage
Board Office	1	1	100%
General Manager Office	1	1	100%
IT	1	1	100%
Operations	6	6	100%
Product Marketing	2	2	100%
R&D	1	1	100%
Sales	0	0	100%
Finance	1	1	100%
Business Management	0	0	100%
Administration	1	1	100%
Total	14	14	100%

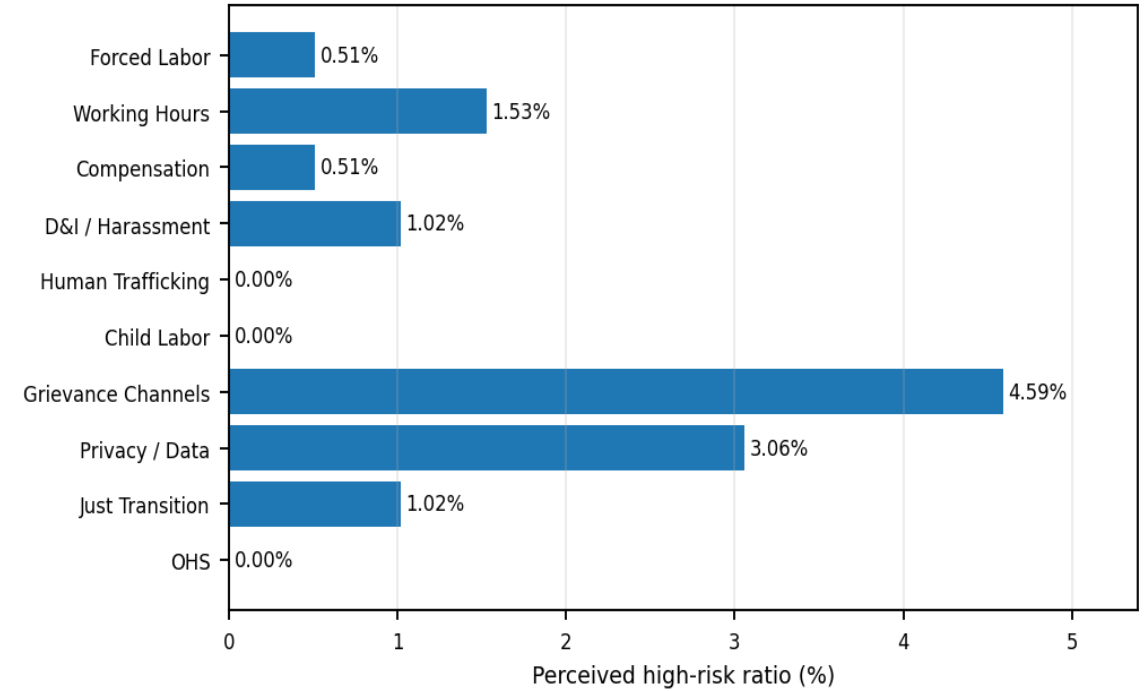


Human Rights Risk Event Identification and Analysis

Employee Risk Scenario Analysis



Female Employee Risk Scenario Analysis



Human Rights Due Diligence Risk Scenario Analysis – Employees

High-risk scenario = likelihood ≥ 2 x severity ≥ 2 .

Definition: <2% low risk; 2%–5% medium risk; >5% high risk.

Results: Top issues were 1) Working Hours, 2) Grievance Channels, and 3) Privacy/Data Protection and Just Transition/Employment Security. No human rights disputes or legal violations occurred in 2025; preventive mitigation and remedial actions continue.

Human Rights Issue	Forced Labor	Working Hours	Compensation	D&I / Anti-harassment	Human Trafficking	Child Labor	Grievance Channels	Privacy / Data	Just Transition	OHS
Question Set	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Likelihood (≥ 2)	0.06	0.18	0.12	0.08	0	0	0.22	0.14	0.14	0.02
Severity (≥ 2)	0.04	0.2	0.1	0.06	0	0	0.08	0.1	0.1	0.06
High-risk Ratio	0.24%	3.60%	1.20%	0.48%	0.00%	0.00%	1.76%	1.40%	1.40%	0.12%

Human Rights Due Diligence Risk Scenario Analysis – Female Employees

High-risk scenario = likelihood ≥ 2 x severity ≥ 2 .

Definition: <2% low risk; 2%–5% medium risk; >5% high risk.

Results for female employees: Top issues were 1) Grievance Channels, 2) Privacy/Data Protection, and 3) Working Hours. No human rights disputes or legal violations occurred in 2025; preventive mitigation and remedial actions continue.

Human Rights Issue	Forced Labor	Working Hours	Compensation	D&I / Anti-harassment	Human Trafficking	Child Labor	Grievance Channels	Privacy / Data	Just Transition	OHS
Question Set	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Likelihood (≥ 2)	0.07	0.07	0.07	0.07	0.00	0.00	0.21	0.21	0.14	0.00
Severity (≥ 2)	0.07	0.21	0.07	0.14	0.00	0.00	0.21	0.14	0.07	0.07
High-risk Ratio	0.51%	1.53%	0.51%	1.02%	0.00%	0.00%	4.59%	3.06%	1.02%	0.00%

Human Rights Issue Ranking, Management, and Risk Mitigation Measures

Target	Issue	Risk Assessment	Current Practices / Policies	Incident / Scenario	Remedial Measures	Risk Level	Survey Results / Improvement		
							Coverage	Risk (%)	Improvement
Employees	Working Hours	Excessive working hours risk (e.g., overtime exceeding limits or failure to provide statutory rest): The risk that the Company may not comply with statutory working-hour limits of 8-12 hours per day and 46-54 hours per month, may not ensure at least one statutory rest day every six days, may not fully implement voluntary overtime principles, or may lack attendance-based overtime alerts and management controls.	Comply with labor-law requirements related to working hours; regularly review company rules for compliance and implement them accordingly. Accurately record employee attendance through the attendance system. Conduct regular workload surveys. Set and adjust annual work objectives. Provide compensatory leave for overtime.	Project schedule pressure may cause daily working hours to exceed 8 hours, potentially reducing employees' time for family care and affecting work-life balance.	Reasonable compensation: Provide overtime pay in accordance with law and encourage employees to rest appropriately. Workload assessment: Regularly review departmental workloads and provide counseling and care for abnormal working hours. Assign tasks fairly and reasonably and add sufficient manpower according to organizational needs to address working-hour issues at the source. Working-hour monitoring: Comply with labor regulations and use the attendance system to ensure monthly overtime hours remain compliant, while advancing digital transformation to improve processes, optimize operations, and enhance overall efficiency.	Med. Risk (All)	100%	3.60% (All)	100%
								1.53% (Female)	

Human Rights Issue Ranking, Management, and Risk Mitigation Measures

Target	Issue	Risk Assessment	Current Practices / Policies	Incident / Scenario	Remedial Measures	Risk Level	Survey Results / Improvement		
							Coverage	Risk (%)	Improvement
Employees	Grievance Channels	Grievance mechanism failure risk (e.g., inaccessible channels, lack of confidentiality, retaliation against complainants, or mishandling of cases): The risk that current grievance mechanisms may lack confidentiality or anonymity, complainants may face retaliation, or employees and external stakeholders may not receive independent acceptance, objective investigation, and timely response for their concerns.	Establish grievance channels that allow verbal or written submissions (such as employee grievance forms, a sexual harassment hotline and dedicated mailbox, and a workplace violence hotline and mailbox), enabling employees to express opinions in a timely manner. Establish cross-departmental and multi-level speaking-up channels. Employees may express opinions through employee monthly meetings, routine supervisor meetings, and employee welfare committee meetings, or submit grievances or suggestions via email or the official website. All feedback is collected and handled by Management Department representatives to ensure that opinions are valued and responded to.	Scenario: Employees are unclear about the existing multiple grievance channels and generally worry that disclosure of their identity may lead to difficulties, exclusion, or poor performance evaluations from supervisors, resulting in a situation where channels exist but employees are afraid to file complaints.	Strengthen promotion and training: Increase the visibility of grievance channels in new-hire training and on the company intranet to ensure employee awareness. Implement objective remedy: Use cross-departmental and multi-level speaking-up channels (such as monthly meetings and welfare committee meetings). The Management Department accepts and objectively investigates cases, effectively corrects deficiencies, and implements care and responses. Implement the non-retaliation commitment: Protect the rights and privacy of complainants, respondents, and other reporters to ensure that complainants or reporters do not suffer any form of retaliation.	Low Risk (All)	100%	1.76% (All)	100%
						Med. Risk (Fem.)		4.59% (Female)	

Human Rights Issue Ranking, Management, and Risk Mitigation Measures

Target	Issue	Risk Assessment	Current Practices / Policies	Incident / Scenario	Remedial Measures	Risk Level	Survey Results / Improvement		
							Coverage	Risk (%)	Improvement
Employees	Privacy and Personal Data Protection	Privacy and personal data leakage risk (e.g., leakage of employee or customer personal data, or improper collection or use): Potential control gaps in information security or daily operations, such as unlawful collection, processing, or use of employee and customer personal data, or data leakage caused by insufficient safeguards that infringes personal privacy rights.	Strictly comply with Taiwan's Personal Data Protection Act and adopt the ISO 27001 information security management system. Establish the Privacy Protection Policy and the Personal Data Protection Management Procedures.	External malicious actors may impersonate senior executives or specific government agencies and send targeted social-engineering phishing emails or text messages under pretexts such as ongoing meetings, urgent business matters, or fake official-payment notices. They attempt to create time pressure and deceive employees into making transfers, providing sensitive personal data, or clicking malicious shortened URLs.	Implement protection principles and immediate loss control: Promote the information security "three don'ts" principle (do not click unfamiliar links, do not enter sensitive data, and do not trust monetary requests without verification) and an immediate reporting mechanism. Introduce AI phishing protection and external labels: AI models block 99.9% of malicious threats daily and prevent zero-day phishing emails. Suspicious emails are subject to delayed delivery and deep scanning, with prominent warning labels triggered by the system. If a high-risk link is clicked, the Safe Browsing database immediately blocks the page. Promote information security awareness training and scenario drills: Conduct regular anti-phishing drills to strengthen employee vigilance.	Low Risk (All)	100%	1.40% (All)	100%
						Med. Risk (Fem.)		3.06% (Female)	

Human Rights Issue Ranking, Management, and Risk Mitigation Measures

Target	Issue	Risk Assessment	Current Practices / Policies	Incident / Scenario	Remedial Measures	Risk Level	Survey Results / Improvement		
							Coverage	Risk (%)	Improvement
Employees	Just Transition and Right to Employment Security	Employment impact risk from transition (e.g., insufficient training amid automation/AI transformation and impacts on the right to work): The potential risk that, during digital or AI transformation, insufficient skills training may cause new technologies to affect employees' right to work and sustainable career development, or create gaps in employment security.	<p>Implement the commitment to sustainable transition: During digital transformation, such as AI adoption, Ennoconn commits to placing employee employment rights and skills enhancement at the core of technology and operating-model upgrades, and will not arbitrarily shift risks to frontline workers in pursuit of technological efficiency.</p> <p>Protect labor rights in accordance with law: Strictly comply with the Labor Standards Act and relevant labor laws to maintain the stability of labor contracts.</p>	Scenario: As the Company introduces AI-enabled tools and advances digital transformation, some employees' competencies may not keep pace with technological change, creating anxiety about technology replacing people and a potential risk that sustainable career development may be hindered.	<p>Promote digital transformation project training: Launch the "AI Digital Transformation Project" and ensure all employees complete Google AI and Google Skills courses so that employees master the application of the latest technology tools.</p> <p>Promote the advanced seed-talent development program: Continue to plan and conduct advanced courses such as A2 for core or high-potential seed members to deepen internal technology upgrading and transformation capabilities.</p>	Low Risk (All)	100%	1.40% (All)	100%