



環旭電子股份有限公司

Universal Scientific Industrial (Shanghai) Co., Ltd.

平等保護與反歧視政策

Equal Protection and Anti-Discrimination Policy

1. 引言 Introduction

- 1.1 環旭電子股份有限公司及其關聯公司 (不包括飛旭集團 Asteelflash Group) (以下合稱“公司”) 致力於營造所有公司成員均能受到尊重、擁有尊嚴的職場環境。所有公司成員都有權利於互相尊重、平等、安全，並杜絕在任何形式的傷害員工平等權的職場環境工作。據此，根據適用於公司的法律法規以及公司的《商業行為與道德準則》、《人權政策》等相關制度，特制定本《平等保護與反歧視政策》(以下簡稱“本政策”)。

Universal Scientific Industrial Co., Ltd. and its affiliates (excluding Asteelflash Group) (collectively, the “Company”) are committed to fostering a respectful and dignified working environment for all personnel. Every member of the Company has the right to work in an environment of mutual respect, equality, and safety, free from any form of conduct that impairs equal rights. Accordingly, and in accordance with applicable laws and regulations as well as the Company’s Code of Business Conduct and Ethics, Human Rights Policy, and other relevant policies, this Equal Protection and Anti-Discrimination Policy (this “Policy”) is hereby established.

- 1.2 本政策提供了有關保護員工平等權的總體指南，但並未涵蓋可能涉及本政策問題的全部情況。如員工有任何疑問，應當諮詢人力資源部。

This Policy provides general guidelines on the protection of employees’ right to equality but does not cover all possible circumstances. Employees are encouraged to consult the Human Resources Department if they have any questions.

2. 適用範圍 Scope of Application

- 2.1 本政策適用於公司的全體員工。“員工”指與公司訂立正式勞動關係的人員 (包括處於新進試用期的人員)，以及勞務派遣、外包人員、實習生、顧問以及以其他形式為公司提供勞務的人員。在可行的範圍內，公司應當通過合同要求其業務合作夥伴遵守本政策或者類似的規則。

This Policy applies to all Company employees. “Employees” refers to individuals who have entered into a formal labor relationship with the Company (including those in the probation period), as well as



dispatched workers, outsourced personnel, interns, consultants, and others who provide services to the Company in various forms. Where feasible, the Company shall require its business partners, via contractual arrangements, to adhere to this Policy or equivalent standards.

- 2.2 本政策旨在避免員工間的歧視、以及侵犯員工平等權的騷擾和暴力行為，但並不完整涵蓋所有員工間可能發生的矛盾。對於其他與員工間矛盾有關的不當行為，請員工參照並遵守公司制定的其他守則（如各實體的《員工工作規則》）。

This Policy aims to prevent discrimination, harassment, or violence that infringes upon employees' right to equality but does not address all interpersonal conflicts that may arise. For other forms of misconduct between employees, please refer to and comply with other applicable codes and rules (e.g., each entity's Employee Work Rules).

- 2.3 員工侵犯公司現有或潛在的商業合作夥伴等外部利益關係方工作人員平等權的行為，同樣參照本政策規制。若在工作中，員工的平等權遭受外部利益關係方工作人員的侵犯，可以向公司舉報。

Conduct by employees that infringes upon the equal rights of staff from the Company's existing or potential external business partners shall also be governed by this Policy. If an employee's right to equality is violated by a representative of an external party during work, the incident may be reported to the Company.

3. 原則 Principles

公司承諾遵循如下原則：

The Company adheres to the following principles:

- 3.1 公司尊重員工以及商業合作夥伴、社區及其他利益關係方工作人員的多元化。公司嚴格禁止任何由於人種、種族、膚色、性別、性別認同及表達、性傾向、婚姻狀況、語言、國籍、公民身份、出生地、戶籍地、宗教信仰、血統、家庭出身、階級、肢體或精神殘障、懷孕、健康狀況、疾病史、樣貌特徵、退伍軍人身份、工會成員身份、受保護的基因資訊、與公司和工作無關的思想或政治立場，或者其他受保護的特徵（以下合稱“受保護的特徵”）而採取的歧視行為。

The Company respects the diversity of employees, business partners, communities, and other stakeholders. Discrimination based on race, ethnicity, skin color, gender, gender identity or expression, sexual orientation, marital status, language, nationality, citizenship, place of birth, registered residence, religion, ancestry, family background, class, physical or mental disability, pregnancy, health status, medical history, physical appearance, veteran status, union membership, protected genetic information, or any belief or political stance unrelated to the Company or work (collectively, “Protected

Characteristics”) is strictly prohibited.

- 3.2 全體員工於職場均能獲得受尊重、公平、合理、專業的對待，均能免於遭受騷擾、虐待、體罰、嘲弄、辱罵、歧視、仇恨、貶抑、威脅、敵對行為、干擾、跟蹤、精神脅迫和侵犯行為。

All employees shall be treated with respect, fairness, and professionalism in the workplace and shall be protected from harassment, abuse, corporal punishment, ridicule, insults, discrimination, hatred, belittlement, threats, hostility, interference, stalking, psychological coercion, and other violations.

- 3.3 公司尊重並重視每個員工獨特的才能、背景和價值觀等個體差異，致力於建設平等、安全的職場環境，以使全體員工都能安心發揮個人專長及其最大潛力，並維護其身心健康。

The Company values the individual differences among employees, including talents, backgrounds, and perspectives, and strives to build an equal and safe work environment where everyone can fully utilize their potential and maintain their physical and mental well-being.

4. 禁止行為和定義 **Prohibited Conduct and Definitions**

- 4.1 公司嚴格禁止歧視行為，以及侵犯員工平等權的騷擾或暴力行為。一項行為可能同時構成歧視以及侵犯平等權的騷擾或暴力行為。

The Company strictly prohibits any form of discrimination, as well as harassment or violence that infringes upon employees’ right to equality. A single act may simultaneously constitute both discrimination and harassment or violence.

- 4.2 歧視：指基於“受保護的特徵”而對個人或群體進行的不合理的區別對待。

Discrimination refers to unreasonable differential treatment of an individual or group based on one or more Protected Characteristics.

- 4.3 騷擾：指以動作、影像、語音、語言、文字、圖片、電子資訊、人員、車輛、工具、設備等方式實施的，違背員工意願的行為，該行為使當事人受到冒犯、脅迫、羞辱，導致了不良的心理感受或敵意、不友好的工作環境。

Harassment refers to any unwelcome act—conducted through physical actions, images, sounds, words, written content, pictures, electronic communications, individuals, vehicles, tools, equipment, or other means—that causes offense, coercion, or humiliation, resulting in psychological distress or creating a hostile or unfriendly work environment.

侵犯平等權的騷擾：指與一項或多項“受保護的特徵”有關的騷擾。

Harassment violating the right to equality refers to harassment related to one or more Protected

Characteristics.

- 4.4 暴力：指在職場環境中，以肢體暴力（如毆打、抓傷、拳打、腳踢、體罰等）、言語暴力（如辱罵、嘲弄、貶抑、恐嚇、威脅等）或心理暴力（如霸凌、欺凌、騷擾、仇恨、干擾、敵對、孤立、拒絕溝通、冷處理、故意交付不合理的工作內容等）等手段，給他人肉體或精神帶去痛苦的行為。

Violence refers to physical violence (e.g., hitting, scratching, punching, kicking, corporal punishment), verbal abuse (e.g., insults, ridicule, belittling, threats), or psychological violence (e.g., bullying, harassment, hatred, interference, hostility, isolation, refusal to communicate, silent treatment, or assignment of unreasonable work) occurring in the workplace that causes physical or psychological harm to others.

侵犯平等權的暴力：指與一項或多項“受保護的特徵”有關的暴力。

Violence violating the right to equality refers to such conduct when related to one or more Protected Characteristics.

5. 對於歧視以及侵犯平等權的騷擾、暴力行為的處理 **Handling of Discriminatory Acts and Harassment or Violence Violating the Right to Equality**

5.1 對於員工的處理 **Actions against Employees**

對於查證屬實的歧視以及傷害平等權的騷擾、暴力行為，公司將依照適用的紀律處分相關規定對相關責任員工進行紀律處分，包括對情節嚴重者單方解除勞動合同或其他聘用關係並不支付補償。相較于一般的不當行為，侵犯員工平等權的行為可能導致更加嚴厲的紀律處分。

Where discriminatory conduct or harassment/violence is verified, the Company shall impose disciplinary actions in accordance with applicable internal rules, including unilateral termination of the employment or engagement contract without compensation in severe cases. Such violations may result in stricter penalties than general misconduct.

同時，公司有權將涉嫌違法、犯罪的責任人員移送行政、司法部門處理。

The Company also reserves the right to refer suspected illegal or criminal behavior to administrative or judicial authorities.

5.2 對業務合作夥伴工作人員的處理 **Actions against Business Partner Personnel**

公司有權將業務合作夥伴員工的上述行為報告給其雇主進行處理。同時，公司有權將涉嫌違法、犯罪的線索提交行政、司法部門處理。



The Company may report such conduct by employees of business partners to their employer and may refer suspected violations to administrative or judicial authorities.

6. 平等保護與反歧視保障機制 Equal Protection and Anti-Discrimination Safeguard Mechanisms

6.1 承諾函的簽署 Commitment Letter

公司員工應當根據公司相關規定，在入職時和入職後的規定週期內簽訂與“平等保護與反歧視”相關的文件，包括確認其已閱讀、理解，並承諾遵守本政策的各項規定。

Employees are required to sign a letter related to “equal protection and anti-discrimination” at onboarding and during prescribed intervals, confirming that they have read, understood, and agreed to comply with this Policy.

6.2 平等保護與反歧視合規培訓 Anti Sexual Harassment Training

法務部將根據公司相關規定，週期性地提供涉及本政策的合規培訓。相關員工必須積極參加該培訓。

The Legal Department will organize regular compliance training on this Policy in accordance with Company requirements. Relevant employees must actively participate in such training.

6.3 投訴舉報機制 Complaint and Reporting Mechanism

6.3.1 舉報 Reporting

公司針對違反本政策要求的行為設置了投訴舉報管道。凡發現存在違反本政策情事的員工，應當向公司進行舉報。公司也鼓勵外部利益相關方舉報任何違反本政策的行為。

The Company has established channels for reporting violations of this Policy. Any employee who becomes aware of a violation is obligated to report it. External stakeholders are also encouraged to report misconduct.

舉報應當將相關事實、材料、證據發送至公司以下各廠區信箱。公司將根據相關規定，對舉報事項進行調查處理。

臺灣廠區：tw.sys.er@usiglobal.com

昆山廠區：usi_cn_ks_er@usiglobal.com

上海廠區：zj.gp.hrer@usiglobal.com

惠州廠區：hrer@usiglobal.com

越南廠區：hph.gp.hrer@usiglobal.com

墨西哥廠區：mx.gp.hrer@usiglobal.com



Reports should be submitted, with relevant facts and evidence, to the Company's following site-specific mailboxes. The Company will investigate and handle reports in accordance with internal procedures.

Taiwan Site: tw.sys.er@usiglobal.com

Kunshan Site: usi_cn_ks_er@usiglobal.com

Shanghai Site: zj.gp.hrer@usiglobal.com

Huizhou Site: hrer@usiglobal.com

Vietnam Site: hph.gp.hrer@usiglobal.com

Mexico Site: mx.gp.hrer@usiglobal.com

舉報人可以具名或匿名的方式進行舉報，但無論何種方式，公司均鼓勵舉報人留下聯繫方式以便對舉報內容進行詢問、查證。公司鼓勵舉報人盡可能收集並提交與相關事實對應的材料和證據（如錄音和相關通訊記錄）。舉報資訊為保密資訊，非因調查處理的需要並經舉報人同意，不得洩露。在需要披露該等保密資訊時，應當遵循“最小必要”原則。

Reports can be made anonymously or under the reporter's name. Regardless of the method, reporters are encouraged to provide contact details to facilitate follow-up. Supporting evidence (e.g., recordings, message logs) is encouraged. All reporting information is confidential and may not be disclosed except where necessary for investigation and with the reporter's consent. Disclosures must follow the principle of "minimum necessary".

在可行的範圍內，公司將盡可能地對舉報人的身份予以保密，將參考舉報人的意見，從最有利於對其身份和相關資訊保密的角度，嚴謹而迅速地選擇和執行調查方法。公司關於此類案件的調查應獨立公正開展。如果經過合理調查，因為證據或資訊缺失難以得出對舉報人有利結論的，公司應當向其闡明原因。

Where feasible, the Company will maintain the confidentiality of the reporter's identity and will select and execute investigation methods with discretion and speed. Investigations must be independent and impartial. If the Company cannot substantiate a claim due to lack of evidence, the reporter will be informed of the reason.

公司舉報人的權益不受公司其他員工的不當侵害。公司不允許任何員工因為某員工的善意舉報或配合調查而對其採取任何打擊報復措施。打擊報復包括實施或威脅實施某項行為，從而造成上述員工：

The Company prohibits retaliation against anyone who reports in good faith or cooperates with investigations. Retaliation includes any action or threat of action that leads to:



- (1) 名譽受損； Damage to reputation;
- (2) 遭受騷擾、歧視或暴力事件； Harassment, discrimination, or violence;
- (3) 降職、喪失晉升機會、解除勞動關係或其他不利的人事待遇； Demotion, loss of promotion, termination, or adverse personnel actions;
- (4) 喪失、減少獎金或對其薪酬產生其他不利影響的舉措；及 Loss or reduction of bonuses or other compensation penalties; or
- (5) 任何其他形式的不公平待遇或損害。 Any other form of unfair treatment or harm.

員工在提交舉報或配合調查時，應當有合理理由認為其提供的情況是真實的，在這種情況下，即使最終該情況被認定為無證據支持或者與事實不符，上述員工仍受保護。以傷害公司或他人的目的惡意提交舉報或捏造事實材料者，不受保護，公司可以依照相關紀律處分規定對其進行紀律處分。

Employees must have reasonable grounds to believe their report is truthful. If a report is ultimately unsupported by evidence, protection still applies. Malicious or fabricated reports intended to harm others are not protected and may result in disciplinary action.

6.3.2 程序 Procedures

公司對於任何違反本政策之行為採取零容忍政策，並將徹底調查任何經善意舉報的違規事項，並即時處理。公司所有員工、經理人、監察人及董事有義務配合公司進行不當或不道德行為的調查程序。

The Company adopts a zero-tolerance policy for any conduct in violation of this Policy and will thoroughly investigate all good-faith reports and take timely action. All employees, managers, supervisors, and directors of the Company are obligated to cooperate with investigations into misconduct or unethical behavior.

公司對舉報事項的處理遵循規範流程，包括以下步驟：舉報資訊由人力資源部接收後，將進行初步評估，確認是否屬於本政策適用範圍並決定是否立案調查。若決定立案，公司將指派相關職能人員組成調查小組，並依實際情況進行資料審閱、訪談及事實調查。調查結束後，人力資源部將整理並記錄調查過程、提供調查結論及建議處理措施，以書面報告或其他適當形式予以保存。根據案件的性質，相關事項將提報至相應管理層審議。公司據此依法依規作出處理決定，並在必要時推動相關單位執行改進行動。對於非匿名舉報者，在不違反保密義務的前提下，公司可提供適當回饋。所有案件記錄將依法妥善保存。

Reports will follow a standardized handling process. Upon receipt, The Human Resources Department



will conduct a preliminary assessment based on the nature of the case to determine whether it falls within the scope of this Policy and whether a formal investigation is warranted. If so, an investigation team will be formed with relevant functional personnel. The investigation may include document review, interviews, and fact-finding. Upon conclusion, the Human Resources Department will document the investigation process, present findings and recommendations in a written report or other appropriate format, and preserve it accordingly. Based on the nature of the case, the matter may be submitted to relevant management for deliberation. The Company will take action in accordance with applicable laws and may implement corrective measures through relevant departments. Non-anonymous whistleblowers may receive appropriate feedback, provided confidentiality obligations are not breached. All case records will be properly archived.

倘經查證屬實，公司將根據違規行為的性質與嚴重程度，採取適當的糾正或紀律處分措施，包括但不限於再培訓、工作調整、申誡、小過、大過或解雇。

If the violation is substantiated, the Company will take corrective or disciplinary actions depending on the nature and severity of the misconduct, including but not limited to retraining, job reassignment, reprimand, minor or major demerits, or dismissal.

紀律處分將依據勞動契約、公司內部規範及適用法規，由相關部門依據公司調查程序作出決定。相關人員亦應依公司要求進行改進或糾正。公司保留依據適用法律對違規人員進行求償的權利。

Disciplinary decisions will be made by the departments responsible in accordance with employment contracts, internal regulations, and applicable laws. Individuals involved will also be required to implement corrective actions as directed by the Company. The Company reserves the right to pursue legal claims against violators in accordance with applicable laws.

同時，在不違反相關法令的前提下，違規人員之姓氏、違規內容及處理情形等資訊，將即時揭露於公司內部。

Where legally permitted, the surname of the violator, nature of the violation, and outcome may be disclosed internally in a timely manner.

7. 審查和批准 Review and Approval

公司人力資源部負責版本政策的起草、維護，審查本政策的執行情況，並在適當情況下修改本政策，以反映相關法律法規或實踐中的變化。公司人力資源部為本政策的主要執行部門。

The Human Resources Department is responsible for drafting, maintaining, and reviewing this Policy and may update it as appropriate to reflect legal or practical developments. The Human Resources Department is responsible for its implementation.