

# 人權政策管理辦法

## Human Rights Policy Management Measures

2024/9/3

### 壹、目的 Purpose

- 一、為善盡企業社會責任，保障員工及各利害關係人之基本人權，本公司尊重、支持並自願遵循國際公認之人權規範與原則，包含《世界人權宣言》(Universal Declaration of Human Rights)、《聯合國全球盟約》(United Nations Global Compact)，以及國際勞工組織(International Labour Organization)《工作基本原則與權利宣言》(Declaration of Fundamental Principles and Rights at Work)，且恪遵當地勞動法規。基此，本公司已依上述國際規範與原則制定「人權政策」，並經董事會核可通過。

To fulfill our corporate social responsibilities and protect the fundamental human rights of employees and all stakeholders, we respect, support, and voluntarily adhere to internationally recognized human rights norms and principles. These include the Universal Declaration of Human Rights, the United Nations Global Compact, the International Labour Organization's Declaration of Fundamental Principles and Rights at Work, and local labor regulations. Accordingly, we have formulated a "Human Rights Policy" based on these international norms and principles, which has been approved by the Board of Directors.

- 二、為有效執行本公司之「人權政策」特制定本辦法並恪遵上述國際規範，以杜絕侵犯人權之行為。

To effectively implement our "Human Rights Policy," we have specifically formulated these Human Rights Policy Management Measures to comply with the aforementioned international norms and prevent violations of human rights.

### 貳、適用範圍 Scope

適用於本公司所有的直接營運活動、產品及服務，並擴大影響力於供應鏈利害關係人。

It applies to all our direct operating activities, products, and services, and extends its influence to supply chain stakeholders.

### 參、相關文件 Relevant Documents

- 一、L1-1-26 人權政策  
L1-1-26 Human Rights Policy
- 二、人權盡職調查管理報告  
Due Diligence Management Report for Human Rights
- 三、安全衛生危害鑑別與風險評估管理程序 ISO【IE-M-1700】  
Safety and Health Hazard Identification and Risk Assessment Management Procedures ISO【IE-M-1700】
- 四、教育訓練管理程序 ISO【I9-M-0200】  
Education and Training Management Procedures ISO【I9-M-0200】
- 五、環安衛溝通管理程序 ISO【IE-M-0200】  
Environmental, Safety, and Health Communication Management Procedure ISO【IE-M-0200】

### 肆、專有名詞 Specific Definition

無 None

### 伍、實施及修改 Implementation and Modification

本辦法呈總經理核准後公佈實施，修改時亦同。

This Measure will be promulgated and implemented after being submitted to the President for approval. The same applies to any modifications.

## 陸、作業程序 Operational Procedure

### 一、人權治理 Human Rights Governance

本公司於日常營運過程進行人權管理，確保在業務運營的各個方面尊重人的尊嚴和保護人權。藉由制定人權治理組織、強化人權訓練、鑑別人權議題、盡職調查人權事件、檢討並執行改善措施，以確保人權治理的執行。我們並設立利害關係人，包括員工及供應商的溝通方式，以確保有效管理人權治理。

We conduct human rights management in our daily operations to ensure respect for human dignity and the protection of human rights in all aspects of our business. We ensure the implementation of human rights governance by establishing a human rights governance organization, strengthening human rights training, identifying human rights issues, conducting due diligence investigations on human rights incidents, and reviewing and implementing improvement measures. Additionally, we establish communication methods for stakeholders, including employees and suppliers, to ensure the effective management of human rights governance.

### 二、人權治理組織 Human Rights Governance Organization

董事會是本公司永續發展最高治理機構，督導『ESG 永續發展委員會』推動飛捷的永續任務。『ESG 永續發展委員會』由董事長擔任召集人，總經理為主任委員，推動辦公室負責蒐集利害關係人關注事項，以及結合本公司的營運模式，鑑別人權重大永續議題並訂定永續發展策略。

The Board of Directors is our highest governance body for sustainable development and oversees the "ESG Sustainability Committee" to promote our sustainability mission. The "ESG Sustainable Development Committee" is convened by the Chairman, with the President serving as the chairperson. The promotion office is responsible for collecting stakeholder concerns, identifying major human rights sustainability issues, and formulating sustainable development plans and strategies based on our operating model.

### 三、利害關係人溝通 Communication with stakeholders

本辦法所稱利害關係人包括員工及供應商。本公司得通過多種管道參與和利害關係人進行溝通以了解人權相關需求與人權活動。

The term "stakeholders" as mentioned in this Measure includes employees and suppliers. We will participate in and communicate with stakeholders through various channels to understand their human rights-related needs and activities.

#### 1. 員工溝通 Employee communication

##### 1.1 本公司應定期召開員工大會進行勞資溝通，由高階主管暨單位員工代表出席。

We should hold regular employee meetings for labor-management communication, which should be attended by senior supervisors and employee representatives from the unit.

##### 1.2 本公司應設立員工意見信箱、公司電子公告欄，並於各中心設有各中心專屬 Line 群組隨時與員工溝通。

We should set up employee comment mailboxes, company electronic bulletin boards, and exclusive Line groups in each center to communicate with employees at any time.

##### 1.3 申訴管道及機制 Complaint channels and mechanisms

本公司應制定性騷擾防治及反霸凌相關辦法，並提供下列相關申請管道

We should formulate relevant measures for sexual harassment prevention and anti-bullying, and provide the following application channels:

- 一般勞資溝通管道：[hr@flytech.com](mailto:hr@flytech.com)

General Labor-Management Communication Channel: [hr@flytech.com](mailto:hr@flytech.com)

- 任何侵害員工尊嚴、人權及任何形式的歧視申訴管道：

[whistleblower@flytech.com](mailto:whistleblower@flytech.com)

Complaint Channel for Violations of Employee Dignity, Human Rights, and Any Form of Discrimination: [whistleblower@flytech.com](mailto:whistleblower@flytech.com)

- 性騷擾信箱諮詢及申請管道：[anti-sexhara@flytech.com](mailto:anti-sexhara@flytech.com)

Sexual Harassment Mailbox for Consultation and Application Channels: [anti-sexhara@flytech.com](mailto:anti-sexhara@flytech.com)

- 職場霸凌諮詢及申請管道：[michaellee@flytech.com](mailto:michaellee@flytech.com)  
Workplace Bullying Consultation and Application Channels:  
[michaellee@flytech.com](mailto:michaellee@flytech.com)

## 2. 供應商議合 Supplier Engagement

2.1 本公司應不定期要求與供應商開會討論相關永續議題，並同時向供應商說明公司的企業永續與社會責任相關管理政策及提供申訴管道給供應商。

We should request meetings with suppliers periodically to discuss relevant sustainability issues, explain our management policies related to corporate sustainability and social responsibility, and provide them with a complaint channel.

2.2 本公司得制定供應商管理政策，供應商管理策略除要求簽署各項社會責任承諾書外，並要求供應商落實執行，並輔導供應商持續精進 ESG 相關作為。

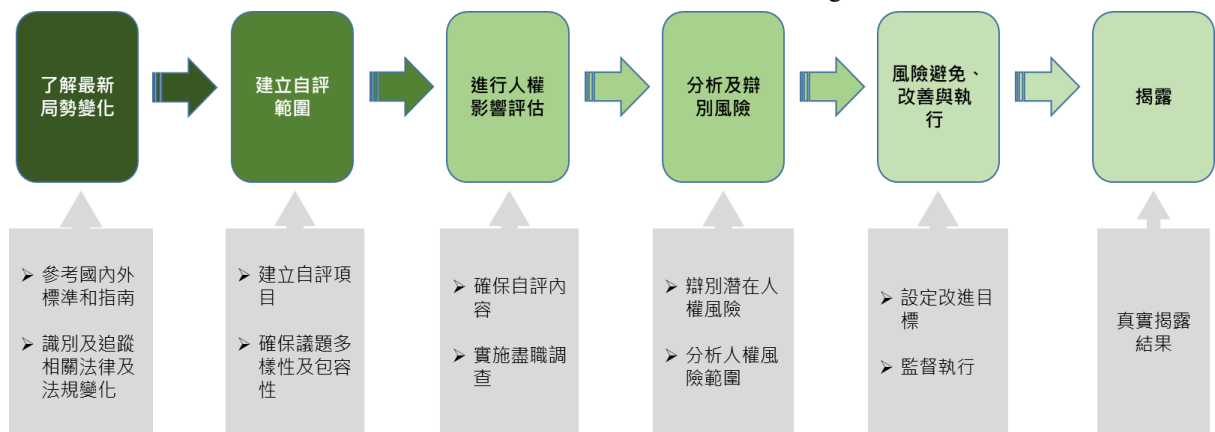
We may formulate a supplier management policy that will not only require suppliers to sign our social responsibility commitment letters but also mandate that they implement these policies. We will also coach suppliers to continuously improve their ESG-related actions.

## 3. 人權風險管理系統 Management System for Human Rights Risks

本公司得進行人權影響評估，以系統性的方式檢視有關人權問題的政策、程序和計劃，識別各個營運據點的潛在人權問題，並提出改進措施。

We may conduct a human rights impact assessment to systematically review policies, procedures, and plans related to human rights issues, identify potential human rights issues at each operating site, and propose improvement measures.

### 3.1 人權議題辨別流程 Identification Process for Human Rights Issues:



### 3.2 鑑別重大人權議題 Identify Major Human Rights Issues:

本公司得依上述流程及下列各項人權事項影響評估，評估出可能發生或潛在風險可能發生的人權議題，以避免透過自身活動造成或促成不利的人權影響，並在發生此類影響時予以解決，以尋求預防或減輕與其運營、產品或服務直接相關的不利人權影響：

We may, in accordance with the above process and the following human rights impact assessments, evaluate human rights issues that may arise or have potential risks. Our goal is to avoid causing or contributing to adverse human rights impacts through our activities, and to prevent or mitigate such impacts directly related to our operations, products, or services:

- 強迫勞動之行為或活動 Forced labor acts or activities ;
- 超時勞動行為 Overtime work ;
- 人口販賣之行為或活動 Human trafficking behaviors or activities ;
- 雇用童工 Employ child labor ;
- 限制員工結社自由 Restrict employees' freedom of association ;
- 限制員工集體談判權力 Restrict employees' collective bargaining power ;
- 存有員工同工不同酬之環境 An environment with unequal pay for equal work ;

- 存有霸凌等暴力環境 An environment with bullying and other forms of violence ;
- 短發薪資或不公平福利行為 Underpayment or unfair benefits practices ;
- 歧視及性騷擾行為或環境 Discriminatory and sexually harassing behavior or environment ; 或 or
- 違反或影響員工身心的不安全工作環境、勞動條件及衛生 Unsafe working environment, labor conditions, and hygiene that violate or affect the physical and mental health of employees

### 3.3 供應鏈人權鑑別 Supply Chain Human Rights Assessment:

3.3.1 本公司得參考「責任商業聯盟（RBA）行為準則 7.0」，制定包涵保護勞動者的合法權益、不歧視勞動者、不使用童工等承諾並要求供應商簽署遵守。在必要時，公司應對供應商進行風險評估和稽核。

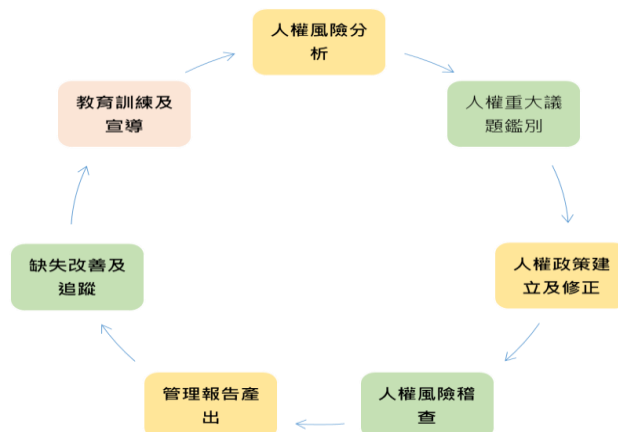
We may refer to the "Responsible Business Alliance (RBA) Code of Conduct 7.0" to formulate commitments, including protecting the legitimate rights and interests of workers, prohibiting discrimination, and banning the use of child labor. We will also require suppliers to sign and adhere to this code. When necessary, we will conduct risk assessments and audits on suppliers.

3.3.2 本公司得依國際人權規範及公司人權政策，鑑別供應商的重大人權議題，並於供應商評鑑審查時加入永續考量因子的評分(應包括勞工安全、環境安全與衛生)。如審查評分未達一定標準時，應提供輔導或協助，安排複查確認改善達標。若供應商無法在期限內達標，飛捷得降低交易量或終止交易的可能性。We may identify major human rights issues of suppliers in accordance with international human rights norms and company human rights policies, which include various sustainability factors such as labor safety, environmental safety, and health, in supplier evaluation and review. If the review score does not meet the required standard, counseling or assistance should be provided, and a follow-up review should be arranged to ensure that improvements meet the standard. If the supplier fails to meet the standards by the deadline, we may reduce the transaction volume or terminate the contract.

### 4. 盡職調查 Due Diligence

本公司每三年得進行人權盡職調查，調查之流程請參閱下方說明及下圖內容：

We may conduct human rights due diligence every three years. Please refer to the description and figure below for the investigation process:



- 人權風險分析 Human rights risk analysis  
透過重大人權議題管理、人權稽核報告等資料進行分析，確認本公司當前各項人權議題之風險分布情形。  
Through the analysis of major human rights issue management, human rights audit reports, and other data, we aim to clarify our current risks related to various human rights issues.
- 人權重大議題鑑別 Identification of major human rights issues

依據人權議題之風險分布情形，將管理重點及資源聚焦於相對高風險之議題上，設定管理目標，並規劃相應之減緩與補救措施。

Based on the risk of human rights issues, focus management and resources on relatively high-risk issues. Then, set management goals and plan corresponding mitigation and remedial measures.

- 人權政策建立及修正 Establishment and revision of human rights policies  
在人權政策首次建立後，持續依據管理循環運作情形，評估是否修訂政策內容，以更符合經營環境變化與組織之策略及目標。

After the human rights policy is initially established, we will continue to evaluate whether to revise it based on the management cycle. This ensures that the policy remains consistent with changes in the business environment, as well as the organization's strategies and goals.

- 人權風險稽核 Human rights risk audit  
稽核各項人權議題之管理及作業情形，並針對重大缺失項目要求立即改善。

We will audit the management and operation of various human rights issues and require immediate improvements for any major deficiencies.

- 管理報告產出 Management report generation  
彙整重大人權議題管理成果、人權稽核報告等資料，總結年度人權管理工作之成果與待改善之項目。

We will compile the management results of major human rights issues, human rights audit reports, and other information. We will also summarize the results of annual human rights management work and identify areas for improvement.

- 缺失改善及追蹤 Improvement and tracking of deficiencies  
依據管理報告之審議結果執行相關改善工作，並持續追蹤成效與達成情形。

Carry out relevant improvement work based on the review results of the management report, and continuously track the outcomes and achievements

- 教育訓練及宣導 Education, training and publicity  
針對內部員工、供應商等利害關係人實施人權相關主題之教育訓練，宣導申訴管道資訊，並公開揭露本公司人權管理工作之執行情況，確保公司與各方之意見交流管道有效暢通。

Implement education and training on human rights-related topics for internal employees, suppliers, and other stakeholders. Publicize complaint channel information and disclose the implementation of our human rights management work to ensure that communication channels between us and all parties are effective and smooth.

## 5. 人權風險評估 Human Rights Risk Assessment

### 5.1 人權風險評估方法 Methods for Human Rights Risk Assessment

本公司得透過內部稽核程序，找出已存在或潛在之風險項目，並評估其可能造成之衝擊程度：

We can identify existing or potential risk items through internal audit procedures and assess their potential impact.

- 範疇 Category  
包含勞工、職業安全、環境、道德、管理系統等 5 大類別。  
It includes five major categories: labor, occupational safety, environment, ethics, and management systems.
- 資料蒐集 Data Collection  
採工作現場觀察、作業記錄審核等方式蒐集相關資料。  
Collect relevant information through on-site observation and review of work records.
- 評等方式 Rating Method  
依據每個議題所規範之基本及額外要求條件，以及該議題所描述之情境，依實際之發生可能性與嚴重性給予不同評分等級。



Based on the basic and additional requirements specified for each topic and the situation described, different scoring levels are assigned according to the actual likelihood and severity of occurrence.

## 5.2 風險定義 Risk Definition

5.2.1 可能性/發生機率(請參閱下表)：定性或定量之評級，均以平均值為計算基礎。

Likelihood/probability of occurrence (see table below): Qualitative or quantitative ratings are calculated based on average values.

| 發生機率 Probability |                               |  |                                  |   |
|------------------|-------------------------------|--|----------------------------------|---|
| 等級<br>Grade      | 程度分類<br>Degree Classification | 定性說明<br>Qualitative Description          | 定量說明<br>Quantitative explanation |   |
| 1                | 極低<br>Extremely Low           | 一般情況下不會發生<br>Generally unlikely to occur | <10%                             | 每年發生 1 次以下<br>Occurs less than once a year            |
| 2                | 低<br>Low                      | 極少情況下會發生<br>Occurs rarely                | 10%~30%                          | 每半年發生 1 次以上<br>Occurs more than once every six months |
| 3                | 中等<br>Medium                  | 某些情況下會發生<br>Occurs in some cases         | 30%~70%                          | 每季發生 1 次以上<br>Occurs more than once per quarter       |
| 4                | 高<br>High                     | 較多情況下會發生<br>Occurs in many cases         | 70%~90%                          | 每月發生 1 次以上<br>Occurs more than once per month         |
| 5                | 極高<br>Extremely High          | 常常會發生<br>Occurs often                    | >90%                             | 每週發生 1 次以上<br>Occurs more than once per week          |

5.2.2 嚴重性/程度 **Severity/Degree**: 依議題之性質選擇量尺 Choose a scale based on the nature of the issue (Scale, Scope, Remediability).

| 嚴重程度 Severity |                               |   |   |   |
|---------------|-------------------------------|---|---|---|
| 等級<br>Grade   | 程度分類<br>Degree classification | 等級<br>Scale   | 範圍<br>Scope   | 可補救性<br>Remediability   |
| 1             | 極輕微<br>Extremely minor impact | 對身心健康及安全影響甚微<br>Extremely minor impact on physical and mental health and safety.  | 對利害關係人無負面影響<br>No negative impact on stakeholders.  | 1 年內可以恢復原狀或消除其影響力<br>It can be restored to its original state or its impact eliminated within 1 year.       |
| 2             | 輕微<br>Minor impact            | 對身心健康及安全有輕度影響：輕微傷害或疾病(無工時損失)<br>Minor impact on physical and mental health and safety: minor injury or illness (no lost working time).                | 在特定利害關係人族群中，對某部份利害關係人造成影響<br>Impact on a subset of stakeholders within a specific stakeholder group.    | 需 1~3 年恢復原狀或消除其影響力<br>It will take 1 to 3 years to restore to its original state or eliminate the impact.   |
| 3             | 中等<br>Moderate impact         | 對身心健康及安全有中度影響：造成傷害需進行復健(有工時損失)<br>Moderate impact on physical and mental health and safety: injury requiring rehabilitation (with lost working time). | 在特定利害關係人族群中，對多數利害關係人造成影響<br>Impact on the majority of stakeholders within a specific stakeholder group. | 需 3~5 年恢復原狀或消除其影響力<br>It will take 3 to 5 years to restore to its original state or eliminate the impact.   |
| 4             | 重大<br>Serious impact          | 對身心健康及安全有嚴重影響：導致身心障礙<br>Serious impact on physical and mental health and safety: leading to physical and mental disorders.                            | 對多數利害關係人族群造成影響<br>Impact on most stakeholder groups.  | 需 5~10 年恢復原狀或消除其影響力<br>It will take 5 to 10 years to restore to its original state or eliminate the impact. |
| 5             | 極重大<br>Critical impact        | 對身心健康及安全有重大影響：導致死亡  | 對所有利害關係人族群造成影響(社 區、員工、供應商...)   | 不太可能恢復原狀或消除其影響力   |

|  |  |   |   |
|--|--|---|---|
|  | Significant impact on physical and mental health and safety: leading to death. | Impact on all stakeholder groups (community, employees, suppliers, etc.). | Unlikely to be restored to its original state or to eliminate the impact. |
|--|--|---|---|

### 5.3 評定重大議題 Assessing Major Issues

本公司得依人權疑慮的議題領域界定可能發生之重大議題，並依人權風險評分等級評定重大議題的風險程度、嚴重性及可能性。

We may define major issues based on the areas of human rights concerns and evaluate their risk level, severity, and likelihood based on the human rights risk score.

### 5.4 人權風險評估結果 Results of Human Rights Risk Assessment

本公司得依評定的重大議題，於特定期間進行重大議題調查並提出調查結果。

We may conduct investigations into major issues within a specific period based on the assessed issues and present the results.

### 5.5 行動、減緩與補救措施 Actions, Mitigation and Remedial Measures

本公司得依重大議題的調查結果提出後續的行動，以及減緩及補救措施。

We may propose follow-up actions, as well as mitigation and remedial measures, based on the investigation results of major issues.

## 6. 人權盡職調查報告書 Human Rights Due Diligence Report

本公司得參考 RBA 的規範，在公司內部進行內部審核，確保公司的永續作為與人權管理的完整性和合適性。並依據人權風險評估結果，辨識公司易涉及人權疑慮的議題，並據以規劃人權減緩措施，以維護勞工權益並落實職業安全衛生打造安全職場。於此報告書中，本公司並得列入對供應商夥伴的人權調查事項，以善盡對環境、勞工、管理體系、道德規範上的責任。

We must refer to RBA's specifications and conduct internal audits to ensure the integrity and appropriateness of our sustainable actions and human rights management. Based on the results of the human rights risk assessment, we identify issues that may involve human rights concerns within the company and plan mitigation measures accordingly to safeguard labor rights and implement occupational safety and health practices to create a safe workplace. This report may also include human rights investigations related to our supplier partners to fulfill responsibilities in areas such as environment, labor, management systems, and ethics.