

天鈺科技永續供應商行為準則 Fitipower Sustainable Supplier Code of Conduct

為確保天鈺科技股份有限公司、其子公司及關係企業（以下合稱「天鈺科技」）之供應鏈遵循《天鈺科技人權及多元共融政策》及《天鈺科技永續發展政策》之原則，確保其工作環境安全無虞、員工權益受到保障與尊重、商業營運促進環保並遵守道德操守，共同實現永續供應鏈願景，天鈺科技制定了本供應商行為準則。

To ensure that the supply chain of Fitipower Integrated Technology Inc., its subsidiaries, and affiliated companies (hereinafter collectively referred to as "Fitipower") adheres to the principles of the "Fitipower Human Rights & Diversity Inclusion Policy" and the "Fitipower Sustainability Policy," ensuring a safe working environment, protecting and respecting employee rights, promoting environmental sustainability, and upholding ethical standards to jointly achieve a sustainable supply chain vision, Fitipower has established this Supplier Code of Conduct.

天鈺科技要求供應商遵循本準則，同時遵守其經營據點之當地法律規範。供應商對本準則的遵守情況將是天鈺科技在做出採購決策時的考量之一。天鈺科技也鼓勵供應商要求其下游供應商、承包商和服務提供商認同並採用本準則，天鈺科技承諾定期收集利害關係人的回饋，持續完善供應鏈管理。

Fitipower requires suppliers to adhere to this Code, as well as comply with local legal regulations in their operational locations. Supplier compliance with this Code will be one of the factors considered by Fitipower when making procurement decisions. Fitipower also encourages suppliers to require their downstream suppliers, subcontractors, and service providers to acknowledge and adopt this Code. Fitipower commits to regularly collect feedback from stakeholders and continuously improve supply chain management.

本準則乃是以「責任商業聯盟行為準則（RBA CoC）」為藍本，並參照國際公認的標準所訂定，包括：
This Code of Conduct is based on the "Responsible Business Alliance Code of Conduct (RBA CoC)" and references internationally recognized standards, including:

- 經合組織跨國企業指南

Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

- 聯合國工商業與人權指導原則

United Nations Guiding Principles on Business and Human Rights

- 國際勞工組織關於工作中基本原則和權利的宣言

International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

- 國際勞工組織基本公約

ILO Core Conventions

- 聯合國《世界人權宣言》

Universal Declaration of Human Rights by the United Nations

本準則由五個章節組成。

The Code is made up of five sections:

- A、B、C 章節：分別為勞工、健康與安全以及環境的標準。

Sections A, B, and C: Outline standards for Labor, Health and Safety, and the Environment, respectively.

- D 章節：與商業道德的標準。

Section D: Covers the standards for business ethics.

- E 章節：概述貫徹本準則的合宜管理體系之所需要素。

Section E: Outlines the elements of an acceptable system to manage conformity to this Code.

A. 勞工 LABOR

供應商應根據國際社會公認的準則，承諾維護勞工的人權，並尊重他們。這適用於所有勞工，包括臨時工、移民工、學生工、合約勞工、直接僱員以及任何其他類型的勞工。

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

勞工標準:

The labor standards are:

1) 自由選擇職業 Freely Chosen Employment

禁止使用強逼、擔保（包括抵債）或用契約束縛的勞工、非自願或剝削性監獄勞工、奴役或販賣的人口。這包括為了得到勞工或服務而使用恐嚇、強迫、威脅、綁架或詐騙手段來運送、窩藏、招募、調配或接收勞工。除了禁止對勞工出入工作場所作出不合理限制外，也不應無理地約束勞工在工作場所內的行動自由，適用時包括勞工宿舍或生活住所。作為招聘程序中的必要部份，必須為所有勞工提供用他們母語書寫的僱傭協議，並且在協議中描述僱傭條款及條件。必須在海外移民勞工離開原本的國家前，為其提供僱傭協議，而在其抵達接收國家後，該僱傭協議不得有任何替換或更改，除非有關更改是為了符合當地法律的要求和提供相同或更佳條款而作出則例外。所有工作應當是自願的，勞工擁有隨時自由離職的權利，且如果勞工按照勞工協議給予合理的通知，則有權終止僱傭關係而不受懲罰。僱主、中介人及二級中介人不得扣留或以其他方式毀壞、隱藏、沒收僱員的身份證或出入境證件，比如政府頒發的身份證明、護照或工作許可證。僱主只能在法律有要求的情況下才可扣留文件。就算是在此情況下，任何時候也不可拒絕勞工取用其文件。不得要求勞工繳付僱主的中介人或二級中介人的招聘費用或其他與其聘用相關的費用。如發現勞工繳付了任何該等費用，該等費用須退還予相關勞工。

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related

fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

2) 青年勞工 Young Workers

不得在任何製造工序中使用童工。「童工」指僱傭任何未滿 15 歲、或未達強迫教育年齡、或該國家 / 地區最低就業年齡的人士 (三項中取年齡最大者) 。供應商應採取適當的機制核實勞工的年齡。符合所有法例與法規的合法職場學習計劃則不在此列。未滿 18 歲的勞工 (青年勞工) 不得從事可能會危及其健康或安全的工作，包括夜班或加班。供應商應適當保管學生記錄、嚴格審核教育合作夥伴，以及按照適用的法例與法規保障學生的權利，從而確保對學生工的管理得當。供應商應當為所有學生工提供適當的支援和培訓。如果沒有當地法律規管，學生工、實習生和學徒的薪資水平應最少與從事同等或相似工作的其他入門級員工相等。如果發現僱用童工，我們將提供協助 / 補救措施。

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.

3) 工時 Working Hours

根據有關的商業實證研究，生產力降低、職員流動率上升以及受傷和患病情況的增多與勞工的疲勞度有顯著的關連。因此，工作時數不應超過當地法律規定的最大限度。此外，每週的工作時數不應超過 60 小時 (包括加班) ，緊急或特殊情況除外，且任何加班必須是出於自願性。每七天應當允許員工至少休息一天。

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

4) 工資與福利 Wages and Benefits

支付給勞工的工資應當符合所有相關的薪酬法律，包括有關最低工資、加班和法定福利的法律。根據當地法律的規例，勞工的加班工資應高於常規時薪水平。禁止以扣除工資作為紀律處分的手段。在每個支薪週期，應及時為勞工提供簡明的工資單據，內含充足的資料證實支付給勞工的薪酬準確無誤。必須按照當地法律聘用臨時工、派遣員和外包員工。

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages,

overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5) 人道的待遇 Human Treatment

避免苛刻和非人道地對待員工，包括暴力、性暴力、性騷擾、性侵犯、體罰、心理或生理壓迫、欺凌、公開羞辱或是口頭辱罵；也不得威脅進行任何此類行為。有關的紀律政策及程序必須有清晰的定義，並向員工清楚地傳達。

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) 反歧視 / 反騷擾 Non-Discrimination/Non-Harassment

供應商應承諾提供一個無騷擾以及無非法歧視的工作場所。公司不得因人種、膚色、年齡、性別、性傾向、性別認同及表現、種族或民族、殘疾、懷孕、信仰、政治立場、團體背景、退伍軍人身份、受保護的基因資訊或婚姻狀況等在招聘及實際工作中歧視或騷擾員工，例如因此而影響工資、晉升、獎勵和接受培訓機會等。應為員工提供適當的場所進行宗教活動。此外，不得讓員工或準員工接受帶有歧視性的醫學檢驗（包括驗孕或處女檢驗）或身體檢查。

Suppliers should be committed to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

7) 自由結社 Freedom of Association

根據當地法律，供應商應當尊重所有員工組織和參與他們所選擇的工會、集體談判和參加和平集會的權利，同時也應尊重員工迴避這類活動的權利。員工及 / 或他們的代表應當能夠在不用擔心歧視、報復、威脅或騷擾的情況下，公開地就工作條件和管理方法與管理層溝通以及分享其想法和憂慮。

In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

B. 健康與安全 HEALTH AND SAFETY

供應商應意識到除了盡量減少與工作相關的傷病發生率外，安全、健康的工作環境有助提高產品和服務的素質、生產的穩定性以及員工的忠誠度和士氣。供應商也應意識到持續地增強對員工的投入和進行教育是辨識和解決工作場所內健康與安全問題的關鍵。

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

安全與健康標準：

The health and safety standards are:

1) 職業安全 Occupational Safety

應透過管控層級識別，包括消除危害、替代流程或材料，以適當的設計加以管控、實行工程和行政管制、防護性保養、安全操作程序（包括上鎖掛牌程序）和持續性的安全知識培訓來識別和評估並減輕工作場所的安全隱患（如化學、電力和其他能源、火災、運載工具和跌倒危險或事故），以免危及員工。若無法透過上述方法有效控制危險源，應為員工提供適當的、保養良好的個人防護裝備以及有關這些危險事故和相關風險的教材。亦必須採取合理的措施，從而讓懷孕的婦女 / 哺乳期女性遠離存在高度危險的工作環境、消除或減少懷孕的婦女和哺乳期女性所承受的任何（包括與分派予其工作相關的）職業健康和風險，以及為哺乳期女性提供合理的哺乳場所。

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

2) 應急準備 Emergency Preparedness

應確認和評估潛在的緊急情況和事件，並透過實施應急方案和應變程序來將其影響降到最低，包括：緊急報告、員工通告和疏散計劃、員工培訓和演習。應急演習必須最少每年進行一次，或按當地法律要求進行，取較嚴格者。應急計劃亦應包括適當的消防偵測和滅火設備、暢通無阻的緊急出口、充足的逃生出口設施、應急人員的聯絡資料和復原計劃。這些方案和程序應著重盡量減低對生命、環境和財產的危害。

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and

evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

3) 工傷和職業病 Occupational Injury and Illness

應當制定程序和體系來預防、管理、追蹤和報告工傷和職業病，包括以下規定：鼓勵員工報告；歸類和記錄工傷和職業病案例；提供必要的治療；調查案例並執行糾正措施以杜絕其根源；協助員工返回工作崗位。

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

4) 工業衛生 Industrial Hygiene

應當根據管控層級識別、評估並控制因接觸化學、生物以及物理危害因子給員工帶來的影響。如果發現任何潛在危險，供應商應尋找機會消除及 / 或減少該潛在危險。如果無法消除或減輕危害，則應透過適當的設計、工程和行政控制消除或控制潛在危險。如這些措施無法有效預防危害，應當免費為員工提供和使用適當、妥善維護的個人防護裝備。防護計劃須持續並包括與這些危險有關之風險的教材。

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

5) 體力勞動工作 Physically Demanding Work

應當識別、評估並控制從事體力勞動工作給員工帶來的危害，包括以人力搬運物料或重複提舉重物、長時間站立和高度重複性 or 高強度的組裝工作。

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

6) 機器防護 Machine Safeguarding

應當評估生產設備或其他類型機器的安全潛在危險。為預防機器對員工可能造成的傷害，應當提供和正確地維護物理防護裝置、連鎖裝置以及屏障。

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to

be provided and properly maintained where machinery presents an injury hazard to workers.

7) 公共衛生和食宿 Sanitation, Food, and Housing

應當為員工提供乾淨的洗手間設施、清潔的飲用水、以及衛生的煮食用具、食物儲存設施和餐具。供應商或勞工中介人提供的員工宿舍應當保持乾淨、安全，並提供適當的緊急出口、洗浴熱水、充足的照明、供暖和通風設備、獨立安全的場所以供儲存個人和貴重物品，以及適當且出入方便的私人空間。

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) 健康與安全溝通 Health and Safety Communication

供應商應當為員工提供以其所講語言或其能夠理解之語言進行適當的職業健康和 safety 資料和訓練，以鑑別員工面對的所有工作場所危險情況，包括但不限於機械、電力、化學、火災和物理危害。在工作場所的醒目處張貼健康與安全相關資料，或將有關資料放在員工可識別並可取用的位置。在開始工作之前及之後定期培訓所有員工。應鼓勵員工提出任何健康和 safety 方面的疑慮，確保他們不會受到報復。

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. 環境 ENVIRONMENT

供應商應認同環境保護責任是生產世界級產品不可或缺的一部份。供應商應查明在製造作業過程中對環境的衝擊，並盡量減少該過程對社區、環境和自然資源造成的不良影響，同時保障公眾的健康和安全。

Suppliers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

環境標準：

The environmental Standards are:

1) 環境許可和報告 Environmental Permits and Reporting

應獲取所有必需的環境許可證（如排放監控）、批准和登記文件，亦要對之進行維護並時常更新，以及遵守許可證的操作和報告要求。

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

2) 預防污染和節約資源 Pollution Prevention and Resource Reduction

應在源頭或透過實踐（如增設污染控制設備、改良生產、維修和設施程序或其他方法）盡量減少排出或杜絕排放污染物以及產生廢棄物。應節約和實踐（如改良生產、維修和設施程序、替換材料、再利用、節約、回收或其他方法）節約自然資源（包括水、化石燃料、礦物和原始森林產品）的消耗。

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3) 有害物質 Hazardous Substances

應當識別、標籤和管理對人類或環境造成危害的化學物質、廢棄物及其他物質，從而確保這些物質得以安全地處理、運送、儲存、使用、回收或再利用及棄置。

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

4) 固體廢棄物 Solid Waste

供應商應實施系統性的措施來識別、管理、減少和負責任地棄置或回收固體廢棄物（無害的）。

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

5) 廢氣排放 Air Emissions

在排放營運過程中產生的揮發性有機化學物質、氣霧劑、腐蝕性物質、微粒、耗蝕臭氧層化學物品以及燃燒副產品前，應當按照要求對其進行分類、例行監察、控制和處理。應依照《蒙特利爾議定書》和適用的法規來有效管理耗損臭氧層的物質。供應商也應當對廢氣排放管制系統的性能進行例行監察。

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

6) 材料限制 Materials Restrictions

供應商應當遵守所有適用法律法規和客戶要求，禁止或限制在產品和製造過程中納入特定物質（包括回收和棄置標籤）。供應商應制定程序，確保限制物質管制作為採購與製造流程的正式要求之一。

Suppliers are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

Suppliers shall establish procedures to ensure that material restrictions are formal requirements in the procurement and manufacturing processes.

7) 水資源管理 Water Management

供應商應當實用水管理計劃，以記錄、分類和監察水資源、使用和排放；尋求機會節約用水；以及控制污染渠道。所有污水在排放或棄置前，應當按照要求對其進行分類、監察、控制和處理。供應商應當對污水處理和控制系統的性能進行例行監察，以確保達致最佳性能和符合法規要求。

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8) 能源消耗和溫室氣體排放 Energy Consumption and Greenhouse Gas Emissions

供應商須訂立公司級別的溫室氣體減排目標。能源消耗和所有相關範疇 1 和 2 的溫室氣體排放應追蹤、紀錄及公開報告，已達溫室氣體減排的目標。供應商應當找到方法來改善能源利用效率並盡量減少能源消耗和溫室氣體排放。

Suppliers are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Suppliers are to look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

9) 生物多樣性及不毀林 Biodiversity and No Deforestation

供應商應遵守生物多樣性保育與森林相關法規，避免營運影響重要棲地，若已座落或不可抗力之需求，須於關

鍵生物多樣性鄰近地區從事營運活動，將制訂緩衝對策（包括預防、減緩、復育、抵銷等作法），致力達成無淨損失（No Net Loss）與零淨砍伐（Zero Net Deforestation），並朝向環境生態淨正向影響（Net Positive Impact）為目標。

Suppliers shall comply with biodiversity conservation and forest-related regulations, avoiding operations that impact critical habitats. If operating in or due to force majeure requirements within critical biodiversity areas, suppliers shall establish mitigation measures (including prevention, reduction, rehabilitation, offsetting, etc.) to achieve No Net Loss and Zero Net Deforestation, and strive for a Net Positive Impact on environmental ecology.

D. 道德規範 ETHICS

為履行社會責任並在市場上取得成功，供應商及其代理商必須謹守最高的道德標準，包括：

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

1) 誠信經營 Business Integrity

在所有商業互動關係中都應謹守最高的誠信標準。供應商應採取零容忍政策來禁止任何形式的賄賂、貪污、敲詐勒索和挪用公款。

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2) 無不正當收益 No Improper Advantage

不得承諾、提供、批准、給予或收受賄賂或其他形式的不正當收益。此禁令包括承諾、提供、批准、給予或收受任何有價之物（無論是直接還是透過第三方間接地進行），以期獲得或保留業務、將業務轉讓他人或獲取不正當收益。應推行監控、記錄留存以及強制執行程序以確保符合反腐敗法律的要求。

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3) 資訊公開 Disclosure of Information

所有的業務來往應具透明度，並準確地記錄在供應商的賬簿和商業記錄上。應當按照適用法規和普遍的行業慣例公開有關參與勞工、健康與安全、環保活動、商業活動、組織架構、財務狀況和業績的資料。不得偽造記錄或虛報供應鏈的狀況或慣例。

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4) 智慧財產權 Intellectual Property

應當尊重智慧財產權；須以保護智慧財產權的方法傳遞技術和生產知識；並必須保護客戶和供應商的資料。

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded.

5) 公平交易、廣告和競爭 Fair Business, Advertising and Competition

應謹守公平交易、廣告和競爭標準。

Standards of fair business, advertising, and competition are to be upheld.

6) 身份保護及防止報復 Protection of Identity and Non-Retaliation

除非受法律禁止，應當制定程序來保護供應商和員工檢舉者（任何揭露公司員工、主管或公務員和政府機構的不正當行為者），並確保其身份的機密性和匿名性。供應商也應制定溝通程序，讓員工可以表達他們的疑慮，而不用害怕遭到報復。

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers* are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

*Whistleblowers definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

7) 負責任地採購礦物 Responsible Sourcing of Minerals

供應商應就其製造的產品成份中鉭、錫、鎢及金的來源及供應鏈，採納政策並進行盡職調查，以合理保證其來源與經濟合作暨發展組織（Organisation for Economic Co-operation and Development, OECD）關於對出自衝突影響及高風險區域之礦石實施負責任供應鏈的指引，或同等及認可的盡職調查框架一致。

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

8) 隱私 Privacy

承諾合理地保護任何與其有業務來往者（包括供應商、客戶、消費者和員工）的個人資料和隱私。應當在收集、儲存、處理、傳播和分享個人資料時遵守隱私和資訊安全法律及監管要求。

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

9) 避免利益衝突 Avoidance of Conflicts of Interest

供應商與天鈺科技之間的商業往來，應避免所任何可能的利益衝突。可能的利益衝突情形包括（但不限於）天鈺科技內部員工或其近親（父母、子女、配偶或兄弟姊妹）在供應商任職，或對供應商有重要投資利益。供應商與天鈺科技對口人員不必要或過度頻繁的社交往來也可能構成利益衝突的疑慮或外觀。所以供應商與天鈺科技人員的任何接觸必須謹守一般商業往來的分際，且一旦有利益衝突的情形必須立刻報告天鈺科技。供應商若有發現任何潛在的利益衝突，必須立即通報天鈺科技（wb@fitipower.com），並採取適當措施以防止因此所可能導致的不當行為。

Suppliers engaging in business transactions with Fitipower should avoid any potential conflicts of interest. Possible situations leading to conflicts of interest may include (but are not limited to) the employment of current Fitipower employees or their close relatives (parents, children, spouses, or siblings) within the supplier's organization, or having significant financial interests in the supplier. Unnecessary or excessively frequent social interactions between suppliers and Fitipower representatives may also raise concerns or the appearance of a conflict of interest. Therefore, all interactions between suppliers and Fitipower personnel should adhere to standard business practices, and any situations involving a conflict of interest must be reported to Fitipower promptly. If suppliers become aware of any potential conflicts of interest, suppliers must immediately report them to Fitipower (wb@fitipower.com) and take appropriate measures to prevent any unethical conduct that may arise as a result.

10) 遵循進出口相關法規 Comply with Import and Export Laws

供應商應瞭解並遵循進出口及運送貨品予天鈺科技或天鈺科技進出口及運送貨品所涉及的相關法令，包括原出口國的出口管制與海關法規、目的地國家的進口和海關法規、支付法令要求的關稅和其他稅賦、以及當地運輸的相關法令。供應商應向其員工和外包商提供運作程序及教育訓練以確保他們對前述法規的遵循。

Suppliers should understand and comply with the relevant regulations related to the import and export, as well as the transportation of goods to Fitipower or in connection with Fitipower's import and export activities. This includes export controls and customs regulations of the country of origin, import and customs regulations of the destination country, tariffs and other taxes required by the payment regulations, and local transportation regulations. Suppliers shall provide operational procedures and educational training to their employees and subcontractors to ensure their compliance with the aforementioned regulations.

11) 遵守保密義務 Confidentiality Obligations

供應商承諾對於在交易洽談、合約締結和交易履行過程中所接觸、知悉、持有或取得之所有與天鈺科技經營、生產、銷售、研發、財務、管理等相關之非公開資訊（包括天鈺科技及客戶之資料）均為機密資料，無論其形式或媒介為何，供應商應嚴守保密義務，絕不得對外公開、洩漏、散佈或揭露予任何第三者。

Suppliers commit to treating all unpublished information related to Fitipower's operations, production, sales, research and development, finance, management, and other areas, obtained or accessed during negotiation, contract formation, or transaction processes, as confidential information. This includes information related to Fitipower and its customers. Regardless of its form or medium, suppliers are obliged to strictly maintain confidentiality and shall not disclose, divulge, distribute, or reveal it to any third party.

E. 管理體系 MANAGEMENT SYSTEMS

供應商應採用或建立範圍與本準則內容相關的管理體系。管理體系的設計應確保：(a) 符合與供應商營運和產品相關的適用法律法規及客戶要求；(b) 符合本準則；以及(c) 識別並減輕與本準則有關的經營風險。管理體系也應當推動持續改進。

Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

管理體系應包含以下要素：

The management system should contain the following elements:

1) 公司承諾 Company Commitment

供應商應制定社會及環境責任政策聲明（內容須包含供應商對盡職調查以及持續改善的承諾），並由行政管理層簽署，政策聲明應以員工理解的語言進行公告，並公告於便於取得之管道。

Suppliers shall formulate the social and environmental responsibility policy statements, which must include the supplier's commitment to due diligence and continuous improvement. The statements should be signed by the executive management and communicated in a language understandable to employees with easy accessibility through appropriate channels.

2) 管理職責與責任 Management Accountability and Responsibility

供應商應明確指定高級主管和公司代表來負責保證管理體系和相關計劃的實施。高級管理層應定期檢查管理體系的運作情況。

The Supplier shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

3) 法律和客戶要求 Legal and Customer Requirements

供應商應制定程序識別、監察並理解適用的法律法規和客戶要求（包括本準則的要求）。

Supplier shall establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

4) 風險評估和風險管理 Risk Assessment and Management

供應商應制定程序識別與供應商經營相關的守法、環境、健康與安全*以及勞工活動及道德風險。評定每項風險的級別，實施適當的程序和實質管制來控制已識別的風險和確保遵行監管規例。

*註：生產區域、倉庫和儲存設施、廠方 / 工作場所支援設備、實驗室和測試區域、衛生設施（浴室）、房 / 餐廳和員工住房 / 宿舍都應納入環境健康與安全風險評估的範圍內。

Suppliers shall establish a process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

*(Note): Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

5) 改進目標 Improvement Objectives

供應商應制定書面績效目標、指標和實施計劃來提高供應商的社會、環境、健康安全績效，包括對供應商為達成這些目標所取得的成效進行定期審核。

Suppliers shall establish written performance objectives, targets and implementation plans to improve the Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

6) 培訓 Training

供應商應為管理層及員工制定培訓計劃，從而實施供應商的政策、程序及改進目標，同時滿足適用之法律法規的要求。

Suppliers shall establish programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

7) 溝通 Communication

供應商應制定程序將公司的政策、實踐、預期和績效清晰準確地傳達給員工、其供應商和客戶。

Suppliers shall establish a process for communicating clear and accurate information about their policies, practices, expectations, and performance to workers, its suppliers, and customers.

8) 員工意見、參與與申訴 Worker Feedback, Participation and Grievance

供應商應制定持續可行的程序（包含有效的申訴機制）以評估員工對本準則所涵蓋之實踐或違反情況和條件的認知度，並獲取員工在這方面的意見，從而推動持續改進。必須為員工提供一個安全的環境，讓其安心地提出申訴和意見而不必擔心受到報復。

Suppliers shall establish processes for ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

9) 審核與評估 Audits and Assessments

供應商應定期進行自我評估，從而確保符合法律法規的要求、本準則內容以及客戶合約中與社會與環境責任相

關要求。

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

10) 糾正措施 Corrective Action Process

供應商應制定程序以確保能及時糾正在內外部的評估、檢查、調查和審核中所發現的不足之處。

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

11) 文檔和紀錄 Documentation and Records

供應商應建立並保留文檔和紀錄，從而確保符合監管規例與公司的要求，同時應保障隱私的機密性。

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12) 供應商的責任 Supplier Responsibility

供應商應簽署「天鈺科技永續供應商承諾書」，並遵循本準則內容。同時須制定程序來將本準則的要求傳達其供應商，並監管其供應商對本準則的遵行情況。

Suppliers shall sign the "Fitipower Sustainable Supplier Commitment Letter" and adhere to this Code. Suppliers also must establish a process to communicate this Code's requirements to their suppliers and to monitor their compliance with this Code.