

Zyxel Group Corporation

HUMAN RIGHTS POLICY

March, 2024

Version 2

Zyxel Group adheres to internationally recognized human rights norms and principles, including those described in the United Nations Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We comply with local laws and regulations and develop human rights policies in accordance with the United Nations Guiding Principles on Business and Human Rights and the Responsible Business Alliance Code of Conduct to safeguard the rights of our employees.

Scope of Application

This policy applies to all enterprises and direct operational activities of Zyxel Group, including employees, customers, suppliers, contractors, and partners, to safeguard their human rights regardless of nationality, race, class, language, ideology, religion, political affiliation, birthplace, gender, sexual orientation, age, marital status, appearance, physical or mental disabilities, and other groups.

Management Framework

Human rights management at Zyxel Group is supervised by the Board of Directors as the highest level of oversight. The execution of human rights management is carried out by the Labor and Human Rights Subcommittee of Zyxel Group's Sustainability Committee, with reviews conducted by the Sustainability Audit Subcommittee. The Sustainability Committee provides regular reports on execution outcomes to the Board of Directors.

Regulatory Measures

Zyxel Group explicitly formulates internal management regulations including work rules, employee handbooks, sexual harassment prevention, and anti-workplace bullying policies, clearly stating the protection of employee rights and ensuring proper care for colleagues. Additionally, to enhance the human rights of all employees in the supply chain, Zyxel Group has also formulated a "Supplier Code of Conduct" to jointly ensure the welfare of their suppliers' employees.

Management Policies

Our focus includes but is not limited to the following human rights protection principles:

- Ensuring freedom of employment, equal job opportunities, training and development, and promotion opportunities.
- Safeguarding the labor rights of different ethnic groups, establishing a diverse, inclusive, and harmonious workplace environment.
- Legal and fair working hours and remuneration, with equal pay for equal work guaranteed.
- Prohibition of modern slavery, child labor, forced labor, and human trafficking.
- Zero tolerance for any form of harassment, bullying, or discrimination.
- Establishing information security and confidential information protection mechanisms to safeguard the information security of employees, customers, and suppliers.
- Taking measures to provide a safe, healthy, and hygienic working environment.
- Establishing a free two-way communication channel to provide employees with the freedom to express their opinions.
- Supporting employees' freedom of assembly, association, and collective bargaining rights.

- Committing to responsible mineral procurement to protect human rights, health, and the environment in mineral-producing areas.

Risk Assessment

Conducting human rights due diligence, assessing human rights risks, and implementing remedial measures through risk identification.

Mitigation Measures

Zyxel Group implements mitigation measures for human rights issues through diverse communication channels, advocacy activities, and education and training.

Diverse communication channels: We maintain an open and transparent feedback channel for stakeholders to provide feedback on human rights issues and file complaints.

Advocacy and education: Internally and externally advocating Zyxel Group's human rights policy and providing human rights education and training to employees, suppliers, and contractors to promote awareness and a culture of human rights protection, enhancing concern for and attention to human rights issues.

Disclosure and Communication:

Publicly disclose and communicate relevant information on human rights governance and implementation outcomes to stakeholders. Additionally, companies should regularly review and optimize due diligence tools and processes, as well as the overall integrity of human rights governance policies and measures, to improve human rights management performance.

Tracking and Improvement:

Regularly track, review, and evaluate implementation outcomes, continuously improve, review, and optimize tools and processes.

Zyxel Group is committed to practicing human rights governance, implementing human rights protection, respecting the human rights of all stakeholders, and achieving sustainable business development.

Zyxel Group Chief Sustainability Officer:

