

Zyxel Group

HUMAN RIGHTS POLICY

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Version 4

Zyxel Group is committed to support internationally recognized human rights standards and principles, including the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We comply with the legal regulations of the locations where we operate and establish our human rights policy based on the United Nations Guiding Principles on Business and Human Rights and the Responsible Business Alliance (RBA) Code of Conduct, ensuring the protection of employee rights.

Scope

This policy applies to all Zyxel Group enterprises, direct business operations, products, services, and investment subsidiaries. It extends to employees, customers, suppliers, contractors, communities, and other external stakeholders, ensuring the protection of human rights regardless of nationality, ethnicity, social class, language, ideology, religion, political affiliation, place of origin, gender, sexual orientation, age, marital status, appearance, physical features, or disabilities.

Governance Structure

The Zyxel Group Board of Directors serves as the highest supervisory body for human rights management. Execution is carried out by the Labor and Human Rights Task Force under the Zyxel Group Sustainability Committee, with reviews conducted by the Sustainability Audit Task Force. The Sustainability Committee periodically reports implementation results to the Board of Directors.

Regulatory Measures

Zyxel Group has established internal management policies, including work regulations, employee handbooks, anti-sexual harassment policies, and workplace bullying prevention guidelines, to explicitly protect employee rights. To enhance human rights protection across the supply chain, we have also formulated the Supplier Code of Conduct in collaboration with suppliers.

Management Guidelines

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

- **Equal Employment Opportunities:** Ensure freedom of employment, equal opportunities in recruitment, job placement, training, and promotion while eliminating unlawful discrimination.
- **Diversity, Equity, and Inclusion:** Protect the labor rights of diverse groups and foster an inclusive workplace environment.
- **Equal Pay for Equal Work:** Ensure employees receive fair and lawful wages, working hours, and remuneration. Temporary, dispatched, and outsourced workers must be employed under local laws.
- **Minimum Wage and Fair Living Wage:** Provide salaries and benefits that meet or exceed local legal requirements. Regularly review employee wages to ensure they meet the cost of living and encourage suppliers to offer living wages.
- **Zero Recruitment Fees:** Ensure that job seekers and employees do not incur any costs during recruitment, employment, onboarding, retention, or safe return processes. Monitor ethical recruitment practices among labor intermediaries.
- **Prohibition of Child Labor:** Adhere to local minimum age employment laws and take necessary measures to prevent child labor while ensuring the safety, health, education, and development of young workers.
- **Prohibition of Forced Labor and Human Trafficking:** Oppose modern slavery and require employees, third-party labor agencies, suppliers, and business partners to guarantee employment freedom. We reject forced labor, servitude, and human trafficking in any form, including coercion, fraud, debt bondage, or deceptive recruitment practices.
- **Zero Tolerance for Inhumane Treatment:** Prohibit threats, harsh and inhumane treatment, harassment, abuse, corporal punishment, mental or physical coercion, bullying, public humiliation, and discrimination.
- **Gender Equality:** Prohibit discrimination based on gender or sexual orientation. Strictly enforce policies against sexual harassment and gender-based discrimination while ensuring equal pay for equal work.
- **Information Security Protection:** Establish mechanisms for information security and confidential information protection to safeguard the commercial and personal data of employees, customers, and suppliers.
- **Safe, Hygienic, and Healthy Work Environment:** Provide a safe, hygienic, and healthy workplace, working conditions, and training to support employee well-being and work-life balance.
- **Employee Training and Development:** Offer training facilities, professional development programs, training hours, and subsidies to support career growth.

- **Freedom of Expression:** Establish transparent and open communication channels where employees can freely express their opinions without fear of discrimination, retaliation, threats, or harassment.
- **Freedom of Association and Collective Bargaining:** Support employees' rights to freedom of association, union membership, collective bargaining, and peaceful assembly. Recognize and engage in structured social dialogue.
- **Conflict-Free Minerals:** Comply with **OECD Guidelines on Mineral Supply Chains** and commit to responsible mineral sourcing, ensuring that human rights, health, and the environment in mining areas are not compromised.

Risk Assessment

We conduct human rights due diligence, regularly assess human rights risks, and implement preventive and remedial measures based on risk identification.

Mitigation Measures

Zyxel Group mitigates human rights risks through diverse communication channels, awareness campaigns, and education programs.

- **Diverse Communication Channels:** Establish transparent feedback and grievance mechanisms to allow stakeholders to raise human rights concerns and submit complaints.
- **Awareness and Education:** Promote Zyxel Group Human Rights Policy internally and externally. Conduct human rights training for employees, suppliers, and contractors to enhance awareness and cultivate a culture of respect for human rights.

Disclosure and Communication

We publicly disclose and communicate human rights governance-related information and implementation results to stakeholders. Additionally, we regularly review and optimize due diligence tools and processes to enhance human rights governance policies and practices.

Tracking and Improvement

We regularly track, review, and evaluate the effectiveness of human rights practices, continuously improving tools and processes to refine our governance approach.

Zyxel Group remains committed to human rights governance, ensuring the protection of human rights for all stakeholders, and advancing sustainable business development.

Chief Sustainability Officer, Zyxel Group

