TCC Group Holdings 2025 Human Rights and Environmental Due Diligence Risk Identification Statement

Updated August 2026

I. Foreword

In May 2024, Taiwan Cement Corporation officially announced its transformation into a holding company and changed its English name to TCC Group Holdings, spanning 11 industries across 14 major markets worldwide. The cement business covers Taiwan, Mainland China, Türkiye, Portugal, and Africa, while the energy business includes renewable energy, energy storage, and batteries.

As TCC's business expands globally, different regions face varying human rights and environmental issues. Additionally, systemic risks such as climate change and aging populations require early planning and response. To this end, TCC aligns with the EU's Corporate Sustainability Due Diligence Directive (CSDDD). Referencing the UN, OECD guidelines, ISO standards, and European Sustainability Reporting Standards (ESRS), TCC completed its inaugural Human Rights and Environmental Due Diligence Report in 2024.

In 2025, this scope of due diligence was expanded to include Group Operation Headquarters, Cement and Environmental Protection Business (Europe-Africa), Cement and Environmental Protection Business (Asia), Asset Management Business, Charging and Storage Business (Asia), Battery Energy Business, Energy for Social Transformation Business (Ho-Ping Power Company), and Investment Business. The scope of the 2026 due diligence is consistent with the consolidated financial reporting boundary. The latest human rights and environmental risk identification has been completed at this stage, and the risk identification process and results are explained in this document.

II. Implementation Method

A. Due Diligence References

TCC's due diligence methods reference international conventions, declarations, guidelines, standards, regulations, and reports, including:

- International Conventions and Declarations: Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, Declaration on Fundamental Principles and Rights at Work.
- Guidelines: UN Guiding Principles on Business and Human Rights, Human Rights Due Diligence Training Facilitation Guide; OECD Due Diligence Guidance for Responsible Business Conduct, Guidelines for Multinational Enterprises; Draft Taiwan's Guidelines on Enterprises to Respect Human Rights in the Supply Chain.
- Standards: ESRS 1, ESRS 2, ESRS S1, ESRS S2, ESRS S3; ISO 31000:2018 Risk Management – Guidelines, IEC 31010:2019 Risk Management – Risk assessment

techniques, ISO 14091:2021 Adaptation to climate change — Guidelines on vulnerability, impacts and risk assessment; AA1000 Stakeholder Engagement Standard.

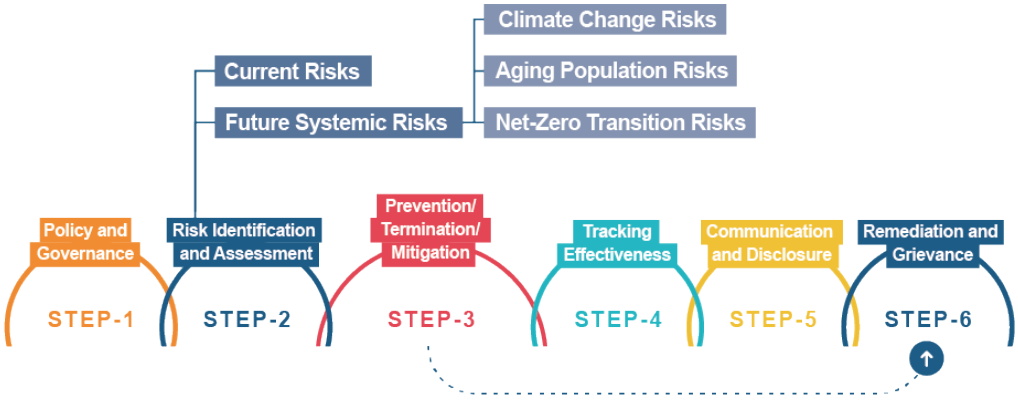
- Regulations: EU Corporate Sustainability Due Diligence Directive and its annexes, Corporate Sustainability Reporting Directive.

B. Definition of Due Diligence and Execution Process

Definition of due diligence: the process by which an enterprise takes action to identify, prevent, mitigate, bring to an end and remediate the actual and potential adverse impacts on people and the environment connected with its business.

The execution method is detailed in Table 1, outlining the steps of TCC's human rights and environmental due diligence process:

Table 1: TCC Human Rights and Environmental Due Diligence Steps

<table>
<tr><th colspan="3">Due Diligence Steps</th></tr>
<tr><td colspan="3"> 
</td></tr>
<tr><th colspan="2">Step</th><th>Description</th></tr>
<tr><td>Step 1</td><td>Policy and Governance</td><td>• Integrate due diligence into corporate policies and management systems.
• The company avoids adverse impacts on human rights and the environment from commitment, governance, and operational processes.
• For details of the implementation, please refer to Chapter III, Human Rights and Environmental Policies and Governance, of this document.</td></tr>
<tr><td>Step 2</td><td>Risk Identification and Assessment</td><td>• Broadly gather the human rights and environmental issues that may affect the various categories of rightsholders in the course of business operations.
• Due diligence references UN, EU, OECD, ILO guidelines and conventions to consolidate relevant issues.
• Consult stakeholders to assess risks. Prioritize high-risk issues with high likelihood and impact.
• This due diligence consults employees, local communities, indigenous peoples, customers, suppliers, and other stakeholders.
• Risk assessment includes current and future systemic</td></tr>
</table>

		risks. TCC assesses three future systemic risks: climate change, aging population, and net-zero transition. • The key issues identified at this stage are incorporated into the Company's double materiality analysis of sustainability issues as a reference, and the results are submitted to the Corporate Sustainable Development Committee to inform corporate strategy and decision-making. • For details of the implementation, please refer to Chapter IV, Risk Identification and Assessment, of this document.
Step 3	Prevention/ Termination/ Mitigation	• Bring actual adverse impacts to an end, and prevent potential future adverse impacts. If adverse impacts remain after termination and prevention measures, mitigation is required. • For details of the implementation, please refer to Chapter V, Management Measures, Effectiveness Tracking, Remediation and Grievance, of this document.
Step 4	Tracking Effectiveness	• Regularly evaluate the effectiveness of measures in preventing or mitigating adverse impacts. • For details of the implementation, please refer to Chapter V, Management Measures, Effectiveness Tracking, Remediation and Grievance, of this document.
Step 5	Communication and Disclosure	• Disclose information and communicate with stakeholders. • For the methods of stakeholder communication during the risk identification process, please refer to Chapter IV, Risk Identification and Assessment, of this document. • This document is disclosed on TCC's official website.
Step 6	Remediation and Grievance	• Provide remediation measures for negative impacts. • Establish corporate grievance mechanisms. • For details of the implementation, please refer to Chapter V, Management Measures, Effectiveness Tracking, Remediation and Grievance, of this document.

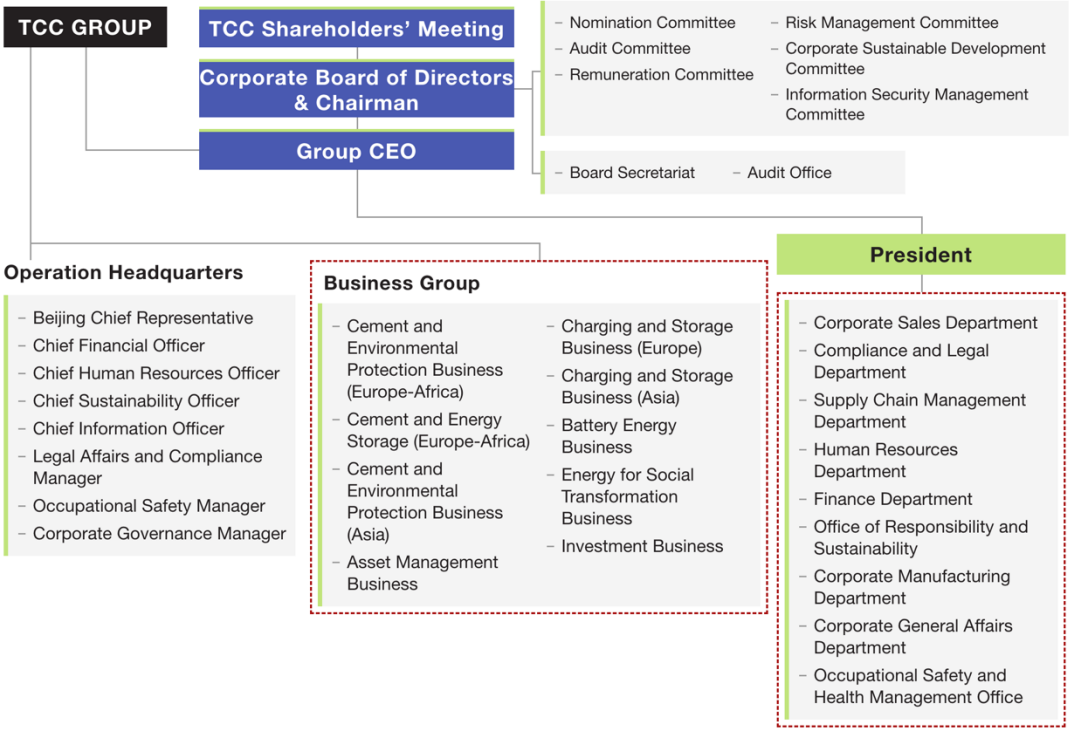
C. Scope of Execution

C-1. Frequency of Due Diligence Implementation

TCC reviews its overall human rights and environmental risks at least every three years. The first human rights and environmental due diligence was conducted in 2024, and the scope of the due diligence was expanded to further business entities from 2025 to 2026; it will continue to be implemented on a regular basis thereafter. When assessing new business relations such as mergers, acquisitions or joint ventures, human rights and environmental risks are included within the scope of due diligence. If a significant change occurs within an implementation cycle, TCC will reassess and update its management measures accordingly.

C-2. Scope of Execution for Business Entities

According to the “Guiding Principles on Business and Human Rights,” due diligence should cover an enterprise's own operations as well as impacts directly linked to its operations, products or services by its business relationships. The scope of the 2026 due diligence is aligned with the boundary of the consolidated financial statements. The organizational structure of TCC Group Holdings is shown in Figure 1, and the red box indicates the scope of this assessment.



Note 1: TCC Group's Business Groups establish various operational sites based on their business scope, including but not limited to companies, R&D centers, manufacturing plants, sales offices, and distribution stations.

Figure 1: Organizational Structure of TCC Group Holdings

C-3. Scope of Execution for Stakeholder Due Diligence

Based on the "Guiding Principles on Business and Human Rights," due diligence should consult potentially affected groups and other relevant stakeholders. TCC has historically identified ten types of stakeholders for significant sustainability issues, according to the AA1000 Stakeholder Engagement Standard, including government, customers, employees, local communities, shareholders/investors, environmental groups/NGOs, media, industry associations/academic organizations, suppliers/contractors, and sustainability associations.

This due diligence focuses on environmental and human rights issues. According to five principles –Dependency, Responsibility, Tension, Influence, and Diverse Perspectives - the priority stakeholders (right holders) for this due diligence are employees, local communities (hereinafter referred to as the community), customers, and suppliers/contractors (hereinafter referred to as suppliers). Given that the Indigenous people within the local community are significant rightsholders, indigenous people are analyzed in the due diligence.

The General Principles of the "Guiding Principles on Business and Human Rights" suggest considering the different risks faced by women and men; the "Due Diligence Guidance for Responsible Business Conduct" mentions that women face different potential or actual human rights impacts compared to men and recommends incorporating gender factors into due diligence. Therefore, TCC will analyze overall employees and female employees separately in its due diligence. Additionally, because the Battery Energy Business in Taiwan employs migrant workers, migrant workers and female migrant workers will also be analyzed separately.

Consequently, the scope of stakeholders for this due diligence includes eight categories: employees, female employees, migrant workers, female migrant workers, communities, indigenous people, customers, and suppliers.

C-4. Scope of Due Diligence Issues

According to the "Guiding Principles on Business and Human Rights," businesses must respect human rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, and the Declaration on Fundamental Principles and Rights at Work. The "Due Diligence Guidance for Responsible Business Conduct" points out that before identifying and assessing actual or potential adverse impacts, companies must broadly gather significant human rights and environmental issues that may affect various stakeholders during their operations.

Therefore, TCC has referred to guidelines and conventions from the United Nations, the European Union, the OECD, and the International Labour Organization to compile significant international human rights and environmental issues. The meanings of adverse impacts are described in Table 2.

Table 2: Human Rights and Environmental Issues and Descriptions of Adverse Impacts

Category	Issue	Adverse Impacts Description	Reference
Human Rights	Child Labor	Children engaged in work that harms their physical or mental health or interferes with their right to education; children subjected to exploitation in any form; or the employment of workers below the minimum age prescribed by local law.	UN, CSDDD, ILO, OECD
	Freedom of Thought, Conscience and Religion	Violation of individual Freedom of Thought, Conscience and Religion.	UN, CSDDD
	Freedom of Expression	Violation of individuals' right to freely express their opinions.	UN
	Privacy	Interference with individual and family privacy or unlawful attacks on their honor or reputation.	UN, CSDDD
	Forced Labor	Forced or compulsory labor through slavery, workplace oppression, debt bondage, human trafficking, etc.	UN, CSDDD, ILO, OECD
	Human Trafficking	The recruitment, transportation, transfer, harboring or receipt of persons by means such as the threat or use of force, coercion, abduction, fraud, deception, or the abuse of power or of a position of vulnerability, for the purpose of exploitation.	UN
	Freedom of Association	Any retaliatory threats (such as job transfers) that obstruct workers from forming or joining unions or not recognizing the legitimacy of the union.	CSDDD, ILO, OECD
	Collective Bargaining	Not negotiating with workers or unions to reach consensus or failing to adhere to agreed terms.	CSDDD, ILO, OECD
	Bullying and Harassment	Bullying in the workplace, or physical or verbal violence and harassment (including sexual harassment).	OECD
	Discrimination/ Diversity and Equality	Employment, position decisions, and work environment face unequal treatment based on race, color, sex, language, religion, political, national or social origin, property, birth or another status such as disability, age, marital and family status, sexual orientation and gender identity, health status, place of residence, economic and social situation.	CSDDD, ILO, OECD
	Occupational Health and Safety	• Failing to consider workers' physical and mental condition, adjust equipment, working time, and processes, and avoid harmful	UN, CSDDD, OECD

Category	Issue	Adverse Impacts Description	Reference
		substances causing worker injuries • Violation of employees' basic rights to food, water, and sanitary facilities.	
	Working Hours/ Wage and Benefits	Wages are insufficient for workers and their families to maintain a decent living within the reasonable limitation of working hours.	UN, CSDDD, OECD
	Fair Trade/ Information Disclosure		
	Equal Remuneration	Different wages are paid for the same work — for example, where male and female workers performing work of equal value receive different pay.	OECD
	Indigenous Peoples	Failing to appropriately engage with indigenous peoples where corporate activities potentially impact them.	OECD
	Conflict Minerals	Miners, mineral traders, smelters and refiners do not conduct due diligence on tin, tantalum, tungsten and gold ores and concentrates.	EU Conflict Minerals Regulation (Regulation (EU) 2017/821)
	Worker Training and Education	During the green transition, no skill training is offered to adapt to new materials, new processes, and new technologies in the industry, nor is there training for workers to develop relevant skills.	UNFCCC
	Whistleblower Protection	No grievance mechanisms allow rightsholders to report concerns about the adverse impacts of corporate activities, and no protection for whistleblowers from retaliation and threats.	CSDDD
Environmental Issues	Climate Change	Companies do not develop climate change transition plans to ensure that their business models and strategies align with limiting global warming to 1.5°C, which is in line with the Paris Agreement.	UNFCCC, CSDDD
	Biodiversity	• Adverse impact on biodiversity • Impact on biodiversity caused by Living Modified Organisms (LMOs) • Trade in endangered species • Adverse impacts on natural heritage as defined in the World Heritage Convention • Adverse impacts on wetlands as defined in the Ramsar Convention	CSDDD, CBD, CITES, World Heritage Convention, Ramsar Convention

Category	Issue	Adverse Impacts Description	Reference
	Pollutants and Waste	• Import or export, manufacture, or use mercury-added products or handling mercury waste in violation of the Minamata Convention. • Produce or use Persistent Organic Pollutants (POPs) or handle their waste in violation of the Stockholm Convention. • Import or export chemicals in violation of the Rotterdam Convention. • Unlawful production, consumption, import and export of controlled substances in the Montreal Protocol. • Transboundary movement of hazardous or other waste in violation of the Basel Convention. • Failure to prevent ship-source pollution in accordance with MARPOL. • Failure to prevent, reduce and control pollution of the marine environment in accordance with UNCLOS.	Minamata Convention on Mercury, Stockholm Convention, Rotterdam Convention, Montreal Protocol, Basel Convention, MARPOL, UNCLOS, CSDDD
Environmental Impact on Human Rights Issues	Environmental Degradation (e.g., water resources, air pollution)	Environmental degradation, such as harmful soil changes, water or air pollution, harmful emissions, excessive water consumption, degradation of land, or other impacts on natural resources, resulting in: • Impairing the production of food; • Lack of access to safe and clean drinking water; • Difficulty in accessing sanitary facilities; • Infringing on land use/acquisition rights;	UN, CSDDD
	Land Use	Land acquisition, development, and use of land, forests, and water resources by companies (such as deforestation) damaging residents' community livelihood rights.	UN, CSDDD

III. Human Rights and Environmental Policies and Governance

A. Policies and Commitments

According to the "Guiding Principles on Business and Human Rights," companies should make policy statements confirming their commitment to fulfilling their obligation to respect human rights. These statements should adhere to the following principles:

1. Approved by the highest corporate executive.
2. Informed by internal and external experts.
3. Outlined in the company's human rights standards, which cover individuals, business partners, and those related to operations, products, and services.
4. Publicly available and communicated to stakeholders.
5. Integrated into corporate operating policies and procedures.

Based on these principles, TCC has compiled a list of its human rights and environmental policies (as shown in Table 3), and details of its participation in external advocacy and commitments (as shown in Table 4).

Table 3: TCC Human Rights and Environmental Policy List

Item	Policy Name	Description
Human Rights	**Human Rights Policy**	■ **Scope:** This Policy applies to the Company and its domestic and overseas subsidiaries, joint ventures and other affiliates over which the Company has substantial control, as well as suppliers and business partners. ■ **Covered Parties:** All employees, including contract employees and interns, are treated with dignity and respect. Fair employment opportunities and labor rights are safeguarded for local community residents, indigenous peoples, women, migrant workers, contract personnel, persons with disabilities and vulnerable groups. ■ **Standards Referenced:** The Company complies with the labor-related laws and regulations of every location in which it operates and safeguards the lawful rights of employees, and follows the United Nations Global Compact, the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the United Nations Declaration on the Rights of Indigenous Peoples, and ILO Convention No. 169 concerning Indigenous and Tribal Peoples in Independent Countries. ■ **Issues Covered:** Child Labor, Human Trafficking,

Item	Policy Name	Description
		Forced Labor, Discrimination, Working Hours / Wage and Benefits, Equal Remuneration, Occupational Health and Safety, Freedom of Association, Collective Bargaining, and Whistleblower Protection. ■ In accordance with the Reporting Mechanism for Violation of Code of Conduct, and upholding the principle of Free, Prior and Informed Consent (FPIC), the Company protects whistleblowers from unlawful infringement and safeguards the lawful rights and interests of whistleblowers and related parties. ■ **Approval:** Effective upon approval by the Board of Directors, and disclosed in the Company's ESG section and related reports.
	Stakeholder Engagement Policy	■ **Scope:** This Policy applies to the overall operating activities of the Company and its subsidiaries (TCC Group Holdings); suppliers are also required to comply with it. ■ **Covered Parties:** Individuals or groups directly or indirectly affected by, or concerned with and able to influence, all operating activities and results of TCC Group Holdings, including but not limited to employees, customers, government and competent authorities, local communities, shareholders / investors, environmental groups and NGOs, media, industry associations and academic institutions, suppliers and contractors, and sustainability associations; potentially vulnerable groups are identified during the identification process. ■ **Standards Referenced:** The five dimensions of the AA1000 Stakeholder Engagement Standard (Responsibility, Influence, Tension, Diverse perspectives and Dependency) are applied to identify and rank the relationship between each stakeholder and TCC Group Holdings on a regular basis. ■ **Issues Covered:** Seven engagement guidelines — stakeholder identification, analysis and ranking; engagement strategy; encouragement of participation; engagement risk management; contact channels; review and reporting; and information disclosure. ■ **Approval:** Established at the 29th meeting of the

Item	Policy Name	Description
		24th Board of Directors on February 27, 2024; effective upon approval by the Board of Directors.
	Anti-Discrimination, Anti-Harassment and Anti-Bullying Policy	■ **Scope:** This Policy is a global standard of the Group (TCC Group Holdings and its subsidiaries) and applies to all operating locations; each subsidiary shall formulate specific implementation measures in line with this Policy and applicable local laws. ■ **Covered Parties:** Every member of the Group (including employees, dispatched workers, technical students and interns) and job applicants. ■ **Standards Referenced:** ILO Convention No. 29 (Forced Labour), No. 105 (Abolition of Forced Labour), No. 111 (Discrimination in Employment and Occupation) and No. 190 (Violence and Harassment), together with the local laws and regulations applicable at each operating location. ■ **Issues Covered:** Discrimination, harassment and bullying; core principles of zero tolerance, confidentiality and prevention of retaliation, applicable to all locations and all personnel. ■ **Approval:** Effective upon approval by the Group Chairperson and resolution of the Company's Board of Directors.
	Occupational Safety and Health Policy Statement	■ **Scope:** Workplaces of the business units involved in the Company's cement manufacturing, mining and shipping port operations. ■ **Covered Parties:** All employees and any contractor or individual under the Company's supervision. ■ **Standards Referenced:** All applicable occupational safety and health laws and regulations, international standards, local laws, and other relevant signed terms and requirements. ■ **Issues Covered:** Targets of zero occupational fatalities and zero safety incidents in the workplace; risk monitoring and assessment; establishment and auditing of the occupational safety and health management system; consultation and participation of employees and

Item	Policy Name	Description
		their representatives; training and drills; and records of hazard prevention and response. ■ **Approval:** Resolved and approved by the Board of Directors.
	Fair Trade and Antitrust Compliance Guidelines	■ **Scope:** All countries in which the Company operates and conducts business. ■ **Covered Parties:** All members of the Company, including all employees and management personnel. ■ **Standards Referenced:** The fair trade acts, antitrust laws, competition laws and anti-monopoly laws of each country of operation, or other laws enacted to promote fair competition and maintain trading order. ■ **Issues Covered:** Concerted actions, monopolisation or abuse of a dominant position, resale restrictions, improper conduct that impedes competition, and dishonest competitive practices. ■ **Approval:** Effective upon approval by the Chairman.
	Supplier Management Policy Statement	■ **Scope:** The Company's supplier management operations. ■ **Covered Parties:** Suppliers. ■ **Issues Covered:** Quality, cost, delivery, service quality, environmental safety and health; human rights and reasonable working hours, wages and inclusion for workers; environmental protection and resource circularity; legality of mineral, material and goods sources; conflict minerals; green procurement; conflict-of-interest avoidance by procurement personnel; economic inclusion (local, small and medium-sized, women-owned and vulnerable-group suppliers); information and communication security and privacy; biodiversity; and corporate sustainability due diligence (improvement plans and regular follow-up for high-risk suppliers). ■ **Approval:** Resolved and approved by the Board of Directors.
	Employee Grievance and Handling Guidelines	■ The Company has formulated these Guidelines and established a Friendly Workplace Committee to handle employee grievances, feedback and other suggestions.
	Reporting	■ **Scope:** The Company. Cases accepted include

Item	Policy Name	Description
	Mechanism for Violation of Code of Conduct	corruption, theft, embezzlement, self-dealing, fraud or other unethical and dishonest conduct; corrupt and bribery conduct such as improperly offering or accepting benefits; other conduct in violation of the Company's systems, rules and procedures; and other conduct in violation of laws and regulations. ■ **Covered Parties:** Company members, business partners and any other organization or individual is entitled to report or file a complaint on improper conduct discovered at the Company. ■ **Standards Referenced:** The mechanism does not cite an external standard. ■ **Issues Covered:** Acceptance and investigation of reports (the Audit Office is the responsible window; investigation results are submitted to the President and the Chairman); whistleblower protection; elimination of any possible retaliation against whistleblowers, with disciplinary action against retaliators where a whistleblower's rights are substantiated to have been harmed; and communication and training on anti-corruption and anti-bribery.
Environment	**Environmental Protection Policy**	■ **Scope:** The Company, extending to partners in the value chain including suppliers, contractors, joint ventures, customers and academic institutions, serving as a common basis to be followed by all internal and external personnel. ■ **Covered Parties:** All employees and external stakeholders. The Environment, Safety and Health Management Committee convened by the Chairman and the President serves as the highest-level accountable unit, under which management representatives supervise the relevant units. ■ **Standards Referenced:** All operating locations worldwide comply with local and international environmental protection laws and other related policy requirements. ■ **Issues Covered:** Seven policy commitments — regulatory compliance, participation by all, green circularity, continual improvement, comprehensive communication, targets and objectives, and sustainable operation; together

Item	Policy Name	Description
		with impact avoidance, pollution reduction, and ecological restoration and compensation. ■ **Approval:** Resolved and approved by the Board of Directors.
	Climate-related Public Participation and Management Policy	■ **Scope:** Operating locations of TCC Group Holdings in all regions. ■ **Covered Parties:** The Company's responsible units and the industry associations and sustainability associations in which it participates. ■ **Standards Referenced:** Alignment with the Paris Agreement to limit global warming to within 1.5°C; targets set under the Science Based Targets (SBT) initiative and by the Global Cement and Concrete Association (GCCA); and support for local climate legislation and policy development at each operating location, such as Taiwan's Climate Change Response Act, Mainland China's Action Plan for Carbon Dioxide Peaking Before 2030, and the European Green Deal. ■ **Issues Covered:** Carbon pricing, carbon trading and carbon verification systems; low-carbon products and services; circular economy and waste management; and green energy. Management mechanisms are established for three categories: engagement activities, association participation, and policy communication. ■ **Approval:** The Board of Directors.
	Water Management Commitment	■ **Scope:** All operating locations. ■ **Covered Parties:** Employees, suppliers, and stakeholders including local governments, institutions and communities. ■ **Standards Referenced:** Recognition of access to water, sanitation and hygiene as a basic human right; compliance with all local, regional, national or international water-related requirements, taking action that may exceed regulatory standards where conditions at an operating location so warrant. ■ **Issues Covered:** Assessment of water stress levels and of risks and opportunities; water management procedures and plans; tracking and management of water flows and water

Item	Policy Name	Description
		quality; water use efficiency and the recycling and reuse of discharged water; monitoring of discharged water and improvement of water quality; awareness and capacity building for employees and suppliers; and stakeholder communication and cooperation. ■ **Approval:** Effective upon approval by the Chairman.
	Biodiversity Policy	■ **Scope and Covered Parties:** The operating activities of TCC Group Holdings itself and business conducted with key value chain partners. ■ **Standards Referenced:** The delineation of IUCN Category I–IV protected areas, UNESCO World Natural Heritage sites and Biosphere Reserves, wetlands designated under the Ramsar Convention, and Key Biodiversity Areas; the GCCA Sustainability Guidelines for Quarry Rehabilitation and Biodiversity Management; and the 23 targets of the Kunming-Montreal Global Biodiversity Framework (GBF) adopted at the 15th Conference of the Parties (COP15) to the UN Convention on Biological Diversity. ■ **Issues Covered:** No exploration or extraction within protected areas; the mitigation hierarchy of avoid, minimise, restore and offset; Biodiversity Management Plans (BMP); the commitment to Net Positive Impact (NPI) by 2040; Nature-based Solutions (NbS); and management of suppliers' biodiversity impacts. ■ **Approval:** Effective upon resolution and approval by the Board of Directors.
	No Deforestation Commitment	■ **Scope and Covered Parties:** TCC's own operations, suppliers and business partners, which are required through cooperation agreements to comply with the commitment and its management guidelines. ■ **Standards Referenced:** The no-deforestation commitment under the agreement reached at the 26th Conference of the Parties (COP26) to the UN Framework Convention on Climate Change; and UN Sustainable Development Goals SDG 13 Climate Action and SDG 15 Life on Land. ■ **Issues Covered:** 100% of operating sites located outside national protected areas; 100% zero

Item	Policy Name	Description
		deforestation outside mining extraction areas, with efforts on ecological restoration and rehabilitation of mining sites, progressively achieving the No Net Deforestation target by 2040; and provision of knowledge on the importance of forest conservation to stakeholders. ■ **Approval:** Reviewed and approved by the Vice Presidents' meeting and signed by the Chairman.
Human Rights and Environment	**Sustainable Development Best Practice Principles**	■ **Scope and Covered Parties:** These Principles cover the Company and the Group's subsidiaries, joint ventures and other affiliates over which the Group has substantial control; suppliers and business partners should implement the sustainability spirit and principles of these Principles in their daily operations. Each subsidiary may formulate its own sustainable development best practice principles according to the characteristics of its industry or the legal requirements of its location, which shall apply in priority where so formulated. ■ **Standards Referenced:** Formulated in accordance with the Sustainable Development Best Practice Principles for TWSE/TPEx Listed Companies; and following the Corporate Governance Best Practice Principles for TWSE/TPEx Listed Companies, the Ethical Corporate Management Best Practice Principles for TWSE/TPEx Listed Companies, the Sample Code of Ethical Conduct for TWSE/TPEx Listed Companies, and relevant international standards. ■ **Issues Covered:** Risk assessment of environmental, social and governance issues and the corresponding risk management; assessment of the impact of the Company's own and the Group's overall operating activities on stakeholders; and sustainability information disclosure and the reporting mechanism to the Board of Directors. ■ **Approval:** Effective upon approval by the Board of Directors.
	Risk Management Policy	■ **Scope and Covered Parties:** The Company and its subsidiaries. A Risk Management Committee,

Item	Policy Name	Description
		a risk management working group and the respective responsible units carry out their duties at their respective levels. ■ **Standards Referenced:** The Regulations Governing Establishment of Internal Control Systems by Public Companies issued by the Financial Supervisory Commission, and the Risk Management Best Practice Principles for TWSE/TPEx Listed Companies jointly established by the Taiwan Stock Exchange and the Taipei Exchange. ■ **Issues Covered:** Risk management covering corporate governance, environmental protection and social inclusion, with risk identification and management across the four dimensions of strategy, operations, climate and finance according to the scope of business; establishment of risk analysis and measurement criteria; risk identification and analysis; and risk evaluation and response. ■ **Approval:** Effective upon approval by the Board of Directors.
	Supplier Code of Conduct	■ **Scope:** TCC Group, including subsidiaries, joint ventures and other affiliates over which the Group has substantial control (hereinafter "TCC"). ■ **Covered Parties:** All suppliers in the supply chain with which TCC cooperates, together with their subsidiaries, affiliates, outsourcing contractors and sub-tier suppliers. ■ **Standards Referenced:** The United Nations Global Compact, the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the United Nations Declaration on the Rights of Indigenous Peoples, the OECD Guidelines, and ILO Convention No. 169 concerning Indigenous and Tribal Peoples in Independent Countries. ■ **Issues Covered:** Child Labor, Forced Labor, Human Trafficking, Working Hours / Wage and Benefits, Discrimination / Diversity and Equality, Bullying and Harassment, Freedom of Association, Collective Bargaining, Occupational

Item	Policy Name	Description
		Health and Safety, Whistleblower Protection, Conflict Minerals, Privacy, Worker Training and Education, Fair Trade / Information Disclosure, Equal Remuneration, Indigenous Peoples, Climate Change, Biodiversity, Pollutants and Waste, and Environmental Degradation (e.g. water resources, air pollution). ■ **Approval:** Approved and published on the official website.

Table 4: TCC's Participation in External Initiatives and Commitments

Issue	Participation in External Initiatives and Commitments
Environmental Issues	■ ISSB Partnership for Early Awareness of Sustainability Disclosure Today
Climate Change	■ Science-Based Targets initiative (SBTi) Member ■ TCFD Supporter ■ Smart Energy Coalition Member (Formerly EP100)
Biodiversity	■ TNFD Early Adopters ■ Business for Nature Call to Action & It's Now for Nature Signatory

B. Human Rights and Environmental Governance

According to the recommendations in the "Guiding Principles on Business and Human Rights," commitment to human rights and environmental policies must be integrated into the management system. By coordinating and integrating relevant units, we aim to avoid adverse human rights and environmental impacts.

TCC's Board of Directors oversees its sustainable development, monitoring its progress and governance structure. The Corporate Sustainable Development Committee, reporting to the Board, meets at least twice yearly to drive, approve, and supervise sustainability initiatives.

The Corporate Sustainable Development Committee comprises six members, including the Chairman (Committee Convener), the President (also a TCC Director), and four other directors, with independent directors accounting for 50%. All members possess ESG expertise. Seven functional groups operate under the Committee — Corporate Governance, Comprehensive Care (including Social Welfare), Sustainable Products and Manufacturing, Sustainable Environment, Green Energy, Biodiversity, and Sustainable Information Disclosure — each composed of senior executives and personnel from relevant departments, assigned ESG-related tasks based on their departmental functions, extending to subsidiaries.

The Chief Sustainability Officer (CSO) coordinates and manages the sustainability projects of these functional groups, reporting regularly to the management team

during the bi-weekly operational meetings chaired by the Chairman. Progress is consolidated and presented by the CSO or relevant business unit heads to the Corporate Sustainable Development Committee for review.

The Board of Directors confirms the Company's sustainable development and ESG management policies based on the resolutions of the Corporate Sustainable Development Committee, presented by the CSO or relevant business executives. The Board also oversees and tracks the management team's annual sustainable development implementation and the achievement of Sustainability Goals to strengthen the corporate structure. Furthermore, the Board evaluates the effectiveness of related strategies or reviews their progress through quarterly reports from the management team, which include sustainable development matters, and urges the management team to adjust when necessary.

TCC's human rights and environmental due diligence identifies key issues at the risk identification and assessment stage. These issues serve as a reference for the Company's double materiality analysis of sustainability issues. The results are then submitted to the Corporate Sustainable Development Committee to inform corporate strategy and decision-making.

Figure 2: TCC Corporate Sustainability Development Committee Structure

IV. Risk Identification and Assessment

Referring to the "Guiding Principles on Business and Human Rights" and the "Due Diligence Guidance for Responsible Business Conduct," companies should address all potential and actual adverse impacts on human rights and the environment. If it is impossible to handle all at once, prioritize due diligence based on the likelihood and severity of impacts, giving precedence to issues with high likelihood and significant impacts. The process must involve stakeholder consultation.

This risk identification adopts a top-down approach: human rights and environmental issue risks are first screened preliminarily on the basis of the characteristics of the industries in which the Company operates and the countries in which its business entities are located; stakeholders are then consulted through questionnaires and focus groups. The risk assessment steps are explained below, followed by an explanation of how each step was implemented:

A. Risk Identification and Assessment Steps

The risk identification and assessment method refers to the risk matrix approach of ISO 31010 (Risk management — Risk assessment techniques) and to the recommendations of the Due Diligence Guidance for Responsible Business Conduct, using the likelihood of occurrence and the severity of impact as the basis for prioritising due diligence issues, without taking into account the effect of preventive and mitigation measures on likelihood and severity (Gross Assessment); severity of impact includes the scale, scope and irremediable character of the impact. Issues with high likelihood and significant impact are addressed first; for potential adverse impacts on human rights, severity takes precedence over likelihood. In this due diligence, likelihood and severity are each assigned corresponding grades, and issues exceeding the grading threshold are included among the issues to be prioritised. The implementation steps are set out in Table 5.

Table 5: Due Diligence Risk Identification and Assessment Steps

Step	Description
Step 1	■ **Identification method**: At this stage, international human rights and environmental risk indicators are used to make a preliminary determination of the geographic location (country) and industry characteristics (sector) of each business entity, and to assess the risk of that entity causing adverse impacts on rightsholders. ■ **Grading threshold:** The raw score of each international indicator is converted, according to its scale, into a standardised risk value between 0 and 1 (0 being the lowest risk and 1 the highest), and the risk value of each operating region is calculated issue by issue. Where the risk value of any country of operation for a given issue reaches 0.75 or above, that issue is included among the issues prioritised in this due diligence.
Step 2	■ **Identification method**: At this stage, rightsholders' views are consulted through questionnaires, focus groups and similar methods. ■ Grading threshold:

	1. For each issue, the questionnaire provides five levels for severity of impact and for likelihood of occurrence (severity: no impact / minimal impact / partial impact / considerable impact / very significant impact; likelihood: no possibility of occurrence / extremely low, 10–30% / possible, 40–60% / highly likely, 70–90% / certain to occur), which rightsholders assess issue by issue. 2. In accordance with the UNDP Human Rights Due Diligence Training Facilitation Guide, the sum of severity and likelihood is used to determine the priority of issues; and following the Guide's recommendation, severity should be given priority even where the likelihood of occurrence is negligible.
Step 3	■ Drawing on all of the above and applying the grading thresholds set at each stage, key issues are ranked in order of priority, and this due diligence will address the key risk issues as a priority. ■ The key issue identification results are submitted by the Corporate Sustainable Development Committee to the Board of Directors.

B. Risk Identification, Assessment and Stakeholder Consultation Methods

The risk identification, assessment, and stakeholder consultation methods for this human rights and environmental due diligence include international human rights and environmental risk indicators, questionnaires, and focus groups. A summary of the risk identification and stakeholder consultation methods for each business entity is compiled in Table 6, and the consultation topics are summarized in Table 7.

Table 6: Summary Table of Risk Identification, Assessment, and Stakeholder Consultation Methods for Each Business Unit

Business Units	International human rights and environmental risk indicators	Questionnaires	Focus groups
Group Operation Headquarters	●	●	
Cement and Environmental Protection Business (Europe-Africa)	●		
Cement and Energy Storage Business (Europe-Africa)	●		
Cement and Environmental Protection Business (Asia)	●	●	●
Asset Management Business	●	●	

Business Units	International human rights and environmental risk indicators	Questionnaires	Focus groups
Charging and Storage Business (Europe)	●		
Charging and Storage Business (Asia)	●	●	
Battery Energy Business	●	●	●
Energy for Social Transformation Business	●	●	
Investment Business	●	●	

Table 7: Corresponding Issues for Rightsholder Consultation

Category	Issue	Employees	Community	Indigenous Peoples	Suppliers	Customers	Migrant Workers
Human Rights	Child Labor	●	●	●	●	●	●
	Freedom of Thought, Conscience and Religion	●	●	●		●	●
	Freedom of Expression	●	●	●		●	●
	Privacy	●			●	●	●
	Forced Labor Human Trafficking	●	●	●	●	●	●
	Freedom of Association	●	●	●	●	●	●
	Collective Bargaining	●	●	●	●	●	●
	Bullying and Harassment	●	●	●	●	●	●
	Discrimination/ Diversity and Equality	●	●	●	●	●	●
	Occupational Health and Safety	●			●	●	●
	Working Hours/ Wage and Benefits	●	●	●	●	●	●
	Equal Remuneration	●	●	●	●	●	●
	Indigenous Peoples			●			
	Conflict Minerals				●		
	Worker Training and Education	●			●		●
	Whistleblower Protection	●			●		●
	Fair Trade/ Information Disclosure					●	
Environmental Issue	Climate Change	●	●	●	●	●	●
	Biodiversity	●	●	●			●
	Pollutants and Waste	●	●	●	●		●
Environmental Impact on Human Rights Issues	Environmental Degradation	●	●	●	●		●
	Land Use	●	●	●	●		●

C. Risk Identification and Assessment Results

The risk assessment methods and the identified significant risk issues requiring priority action are summarized in Table 8. This due diligence will prioritize addressing these significant risk issues.

Table 8 Risk Identification and Assessment Methods and Results

Rightsholder and Identification Method	Implementation Method	Key Issue Identification Results
Employees ■ International Indicators ■ Questionnaire ■ Focus Groups	Risk identification for employees is conducted in two stages, described as follows: **Step 1: International Indicators** The following international indicators are used to review the risks of human rights issues in the regions where all business entities operate worldwide. The issues corresponding to each indicator are set out in the Appendix. ■ Varieties of Democracy (V-Dem) ■ ITUC Global Rights Index ■ UNICEF Children's Rights in the Workplace Index ■ ILO Statistics on Child Labour ■ ILO Global Estimates of Modern Slavery ■ UNODC Trafficking in Persons Data Portal ■ Note: For the grading thresholds, please see the explanation in Table 5. Child labor is, however, determined using a dedicated children's rights indicator (the UNICEF Children's Rights in the Workplace Index), with the ILO Statistics on Child Labour used as a cross-reference. The inclusion threshold is 0.60.	**Step 1: International Indicators** ■ Freedom of Association ■ Collective Bargaining ■ Child Labor ■ Forced Labor / Human Trafficking
	Step 2: Questionnaire Potential risks were identified jointly with employees by questionnaire, with gender factors taken into account throughout the risk identification process. ■ **Scope of Business Entities**	**Step 2: All Employees** ■ Whistleblower Protection ■ Worker Training and Education ■ Bullying and

	Covered by the Survey: For details, please see Table 6. ■ **Survey Response Rate (Number of Questionnaires Returned):** 94% (9,437 questionnaires returned). ■ **Focus Groups**: Discussions focused on the just transition issues related to the cement industry and the decommissioning of the Hoping coal-fired power plant. A total of 22 participants attended, from the Taiwan cement plants of the Cement and Environmental Protection Business (Asia) and the Hoping Power Plant of the Energy for Social Transformation Business.	Harassment ■ Wage and Benefits ■ Working Hours ■ Occupational Health and Safety **Step 2: Female Employees** ■ Bullying and Harassment ■ Worker Training and Education ■ Whistleblower Protection ■ Working Hours ■ Privacy ■ Diversity and Equality ■ Occupational Health and Safety
Migrant Workers ■ Questionnaire	Scope of Business Entities Covered by the Survey: Migrant workers of E-One Moli Corporation (Molicel) and Molie Quantum Energy Corporation under the Battery Energy Business. ■ Survey Response Rate (Number of Questionnaires Returned): 94% (178 questionnaires returned).	**All Migrant Workers** ■ Freedom of Expression ■ Bullying and Harassment ■ Occupational Health and Safety ■ Working Hours ■ Whistleblower Protection ■ Forced Labor / Human Trafficking **Female Migrant Workers** ■ Forced Labor / Human Trafficking ■ Freedom of Expression ■ Whistleblower Protection

		■ Diversity and Equality ■ Discrimination ■ Freedom of Thought, Conscience and Religion
Communities ■ International Indicators ■ Questionnaire	Risk identification for communities is conducted in two stages: Step 1 uses international indicators to make a preliminary screening of issues according to industry characteristics, and Step 2 identifies potential risks through a questionnaire to local residents. Where the same issue appears in both steps, this indicates that the international indicators and residents' subjective assessments are consistent. The steps are described as follows: **Step 1: International Indicators** The ENCORE international indicator is used to make a preliminary screening of the environmental issue risks of the industries to which the Group belongs. The issues corresponding to the indicator are set out in the Appendix. This community risk identification covers all business entities worldwide, with each entity mapped to the corresponding ENCORE sector rating according to its operating type (mining sites, cement plants and RMC plants, power plants, port areas, shipping, environmental technology, offices, and so on). Because the operating model of the Charging and Storage Business has no corresponding ENCORE sector category, other international environmental indicators will be used to assess the related risks in future.	**Step 1: International Indicators** ■ Environmental degradation / waste / land use ■ Water resources ■ Climate change
	Step 2: Questionnaire Potential risks were identified jointly with local community residents by questionnaire, with gender factors	**Step 2: All Community Residents** ■ Environmental

	taken into account throughout the risk identification process. ■ **Scope of Business Entities Covered by the Survey**: Communities surrounding the Taiwan cement plants and Taiwan RMC plants of the Cement and Environmental Protection Business (Asia). • Taipei RMC Plant: Zhangshu Village • Taichung RMC Plant: Side Village • Kaohsiung RMC Plant: Renwu Village • Suao Cement Plant: Chang'an Village, Yongchun Village • Hoping Cement Plant: Heping Village ■ **Survey Response Rate (Number of Questionnaires Returned)**: 84%	degradation / waste / land use ■ Water resources ■ Biodiversity ■ Climate change **Step 2: Female Community Residents (identification results identical to those for all residents)** ■ Environmental degradation / waste / land use ■ Water resources ■ Biodiversity ■ Climate change
Indigenous Peoples ■ Questionnaire	■ **Scope of Business Entities Covered by the Survey**: Indigenous communities surrounding the Taiwan cement plants and Taiwan RMC plants of the Cement and Environmental Protection Business (Asia). • Hoping Cement Plant: Knlibu Tribe (Heping), Gukut Tribe (Hezhong), Qnragan Tribe (Heren) • Suao Cement Plant: Iyo Tribe ■ **Survey Response Rate (Number of Questionnaires Returned):** 86%	■ Indigenous rights ■ Biodiversity ■ Environmental degradation / waste / land use ■ Water resources ■ Climate change
Customers ■ Questionnaire	■ Scope of Business Entities Covered by the Survey: Customers in Taiwan of the Cement and Environmental Protection Business (Asia). ■ Survey Response Rate (Number of Questionnaires Returned): 81%	■ Fair trade / information disclosure ■ Climate change

Supplier Survey	**Existing suppliers:** Risk identification is conducted in two stages, described as follows: **Step 1: International Indicators** The following international human rights and environmental indicators are used to make a preliminary screening of the human rights and environmental risks of the regions and industries in which the supply chains of all business entities worldwide are located. The regions of the supply chain are defined as the countries in which each business entity operates. The issues corresponding to each indicator are set out in the Appendix. ■ Entities surveyed: 1. Cement and Environmental Protection Business (Europe-Africa) 2. Cement and Energy Storage Business (Europe-Africa) 3. Cement and Environmental Protection Business (Asia) 4. Asset Management Business 5. Charging and Storage Business (Europe) 6. Charging and Storage Business (Asia) 7. Battery Energy Business 8. Energy for Social Transformation Business 9. Investment Business ■ Indicators used 1. Varieties of Democracy (V-Dem) 2. ITUC Global Rights Index 3. UNICEF Children's Rights in the Workplace Index 4. ILO Statistics on Child Labour 5. ILO Global Estimates of Modern Slavery 6. UNODC Trafficking in Persons Data Portal 7. ENCORE	**Step 1: International Indicators** **Human rights:** ■ Freedom of Association ■ Collective Bargaining ■ Child Labor ■ Forced Labor / Human Trafficking **Environment:** ■ Environmental degradation / waste / land use ■ Water resources ■ Climate change

	Step 2: Evaluation and Audit ■ **Entities surveyed**: The cement plants, RMC plants, grinding stations, distribution stations and mining subsidiaries of the Cement and Environmental Protection Business (Asia) in Taiwan, Mainland China and Hong Kong, extended in 2025 to the Longshan Cement Plant, Feng Sheng and E.G.C. Cement Corp.; and the Ho-Ping Power Plant of the Energy for Social Transformation Business. ■ Implementation steps 1. Prepare the supplier self-assessment questionnaire. 2. Conduct desktop reviews and risk-level assessments of key suppliers based on the self-assessment questionnaires returned by suppliers and publicly available information. 3. Conduct on-site audits of potentially high-risk suppliers with lower scores. 4. Identify high-risk suppliers based on the review results. ■ Identification results 1. Questionnaire response rate: 92.81% 2. Desktop reviews: 324 suppliers 3. On-site audits: 55 suppliers 4. Second-party on-site audits: 3 suppliers 5. Third-party on-site audits: 2 suppliers (conducted by Intertek) 6. 12 high-risk suppliers identified	**Step 2** **Human rights:** ■ Occupational Health and Safety ■ Freedom of Association ■ Collective Bargaining ■ Whistleblower Protection **Environment:** ■ Environmental degradation / waste / land use ■ Water resources ■ Climate change
	New suppliers: A risk assessment is conducted, a sustainability questionnaire (simplified version) is completed, the Supplier Code of Conduct is signed, and the due diligence checklist review is completed, with qualification determined according to the results.	-

	■ **Scope of implementation**: Cement and Environmental Protection Business (Asia), Energy for Social Transformation Business ■ **Proportion of new suppliers screened using environmental criteria**: 100% ■ **Proportion of new suppliers screened using human rights criteria**: 100%	

V. Management Measures, Effectiveness Tracking, Remediation and Grievance

After assessing the risks of human rights and environmental issues through the aforementioned steps, preventive and mitigating measures are proposed for key human rights and environmental issues based on subsequent steps of the human rights and environmental due diligence process. Additionally, remedial measures are provided for existing impacts. Grievances raised by rightsholders are also an important channel for assessing the effectiveness of management measures, and corporate grievance mechanisms are therefore discussed in this chapter as well.

Table 9 summarizes the assessed risks and their corresponding prevention/mitigation measures from the human rights and environmental due diligence, and Table 10 summarizes TCC's overall grievance and remediation management measures.

Table 11 summarizes the prevention, mitigation, and remediation measures for key issues. For detailed information, please refer to the 2025 TCC Group Holdings Sustainability Report.

Subsequent Human Rights and Environmental Due Diligence Reports will focus on the following key points:

1. Track the effectiveness of TCC's prevention, mitigation, and remediation measures for significant human rights and environmental issues.
2. Continue to refer to conventions and guidelines from the United Nations, ILO, and OECD, and integrate ISO risk assessment methodologies and management standards to establish a global human rights and environmental risk management mechanism applicable to TCC's global business operations.
3. Identify and address systemic human rights and environmental risks, such as climate change risk and the risks associated with an ageing population, in the light of the future model scenarios set out in significant domestic and international research reports.

Table 9: Assessed Human Rights and Environmental Risks and Corresponding Prevention / Mitigation Measures

Category	% of Total Assessed	% of Total	% of Risk with

		Assessed where Risks Have Been Identified	Mitigation Actions Taken
Own operations	100%	1.20%[Note 1]	100%[Note 5]
Existing suppliers	100% [Note 2]	3.94% (4.04%)[Note 3]	100%[Note 4]
Joint ventures[Note 6]	100%	0%	100%
Notes	■ Note 1: Recordable work-related injury or ill health of global business entities ÷ total number of employees. ■ Note 2: Tier-1 suppliers of the following business entities identify risks using sustainability questionnaires, while other business entities identify risks using international human rights and environmental indicators. 1. Cement and Environmental Protection Business (Asia): cement plants (including the Longshan Cement Plant), RMC plants, grinding stations (including the Fuzhou Plant), the environmental technology companies under each plant, and office locations in Taiwan and Mainland China, as well as the subsidiaries Feng Sheng Enterprise Company and E.G.C. Cement Corp. 2. Energy for Social Transformation Business: Ho-Ping Power Company. ■ Note 3: The aforementioned supplier sustainability questionnaires identified a total of 12 high-risk suppliers, representing 3.94% of total procurement spend and 4.04% of the number of suppliers. ■ Note 4: This figure represents the percentage of the 12 identified high-risk suppliers with an agreed corrective action/improvement plan. ■ Note 5: All business entities have formulated corresponding prevention and mitigation plans based on the risk identification results. ■ Note 6: The joint venture is Ta-Ho Environmental.		

Table 10: Summary of TCC's Overall Grievance and Remediation Management Measures

Item	Management Measures
Grievance	**Reporting of Misconduct** ■ TCC has established the "Reporting Mechanism for Violation of Code of Conduct" to encourage internal and external individuals to report misconduct, providing multiple channels including email, written submissions, and in-person reports. Anonymous reporting is permitted, but complete information and supporting documents are required to prevent malicious accusations. Whistleblower identities and report contents are kept confidential, and TCC undertakes that no whistleblower will be subject to improper treatment as a result of reporting. Where a report

	involves senior management, the whistleblower may submit it directly to the Audit Committee. TCC promotes the reporting mechanism through integrity management education and training courses to ensure that employees and external parties are familiar with the system and procedures. ■ Upon receipt of a report, the Audit Office completes registration within five working days and determines whether to accept the case based on the relevant information. Once accepted, the Audit Office forms an investigation team with relevant personnel to ascertain the facts, and submits the investigation findings and improvement recommendations to the President and the Chairman; if the case involves the President, it is submitted directly to the Chairman. Where a report is substantiated, the Audit Office collaborates with relevant units to review internal controls and operating procedures, propose corrective measures, and report regularly to the Audit Committee to prevent recurrence. **Employee Grievances** ■ TCC has established grievance channels including an online friendly workplace platform and an employee feedback email, handled confidentially by dedicated personnel. Appropriate protective measures are taken in accordance with the law to protect the personal data and privacy of whistleblowers and complainants. An Appeal Review Committee has been established to ensure that cases are handled properly, professionally and impartially, and that complainants are not subject to unfair retaliation or treatment. ■ Since 2025, the Cement and Environmental Protection Business (Europe-Africa) has additionally implemented in full an anonymous, multilingual reporting service available year-round. All information received is access-controlled by a third-party unit on a need-to-know basis to safeguard whistleblower anonymity and data confidentiality, and is de-identified before being confirmed with the internal compliance department. **Suppliers** ■ A whistleblowing and whistleblower protection system is in place. Where a supplier becomes aware of corruption, breach of trust, theft, misappropriation, self-dealing, fraud, or other unethical or dishonest conduct by Company personnel, the supplier may file a report under the Company's code of conduct reporting system.

	Migrant Workers ■ E-One Moli Corporation of the Battery Energy Business employs migrant workers from the Philippines and Vietnam. Employee grievance channels therefore cover migrant workers, with mailboxes and forms provided in their native languages such as English and Vietnamese, and forums for migrant colleagues are held to publicize the grievance channels. **Customers** ■ The Cement and Environmental Protection Business (Asia) has established the "Customer Rights Protection Policy," the "Domestic Customer Service Handling Procedures," and the "Export Customer Service Handling Procedures," and each plant has its own "Customer Service Guidelines," forming a complete grievance handling process. The Cement and Environmental Protection Business (Europe-Africa) and the Charging and Storage Business (Europe) have also established standardised grievance mechanisms, allowing customers to provide feedback through the official website, social media, and a 24-hour hotline. ■ OYAK Cement and Atlante operate dedicated mobile applications, i-Deal and myAtlante respectively, providing digital grievance services. Cases are opened immediately upon receipt, with a dedicated unit making prompt contact and providing progress updates, and with regular analysis and follow-up on improvements. **Communities** ■ TCC plans to establish grievance channels in the communities where its plants are located, so that residents can raise grievances where the Company causes adverse human rights or environmental impacts. The media and format of these communication channels will be determined by consulting community residents for their feedback.
Remedial Measures	Where TCC identifies that it has caused or contributed to an adverse human rights or environmental impact on rightsholders, it will provide for remediation through legitimate processes, and such remediation will be proportionate to the significance and scale of the impact. In determining the remedy, TCC will consult the affected rightsholders or their representatives. TCC takes the following steps according to its degree of involvement: ■ Where the Company causes an adverse impact: take action to cease the impact and prevent its recurrence. ■ Where the Company contributes to an adverse impact: take

	action to cease the contributing conduct and use its leverage to mitigate any remaining impact to the greatest extent possible. ■ Where an adverse impact is caused by a business partner (such as a supplier or contractor) and is directly linked to the Company's operations: take action based on the Company's leverage over that business partner, the importance of the relationship to the Company, and the severity of the infringement.

Table 11: Summary of Prevention/Mitigation/Remediation Measures

Rightsholders	Issue	Prevention/Mitigation/Remediation Measures	
Employees	Whistleblower Protection	Prevention	Please refer to Table 10, Summary of TCC's Overall Grievance and Remediation Management Measures, in this document.
	Worker Training and Education	Prevention	**Description** ■ **Purpose:** TCC's net-zero and digital transformation should focus on skills development in order to succeed. Access to training and education helps employees to develop the skills needed to transition to new types of jobs or to work with new materials, processes and technologies in their existing jobs. ■ **Participants:** All employees. ■ **Format:** Online and in-person courses. ■ **Key data:** 344,986 training hours in 2025. ■ **Training content:** 1. Development Program: Learning Ability — TCC Lyceum; Leadership — Development Program; Life Skills — Health Care and Financial Management 2. Sustainability Program: Newcomer Training, Sustainable Learning Action Program, Institute of NextGen Sustainability (formerly the Carbon Academy) 3. Management Program: Management Program for Mid-Level and New Managers, Leadership Impact Academy, Information Security Awareness and Management 4. Cross-Domain Program: Generative AI Application Practices, Thinking Program, Professional Image Building

			and Workplace Etiquette, Global Economic and Investment Trend Observation, Effective Time Management 5. Language Program: 1-on-1 Courses, Practical Daily Conversation, Writing Intensive Training, Current Affairs Reading, Advanced Business, Online Courses ■ **Actions taken:** 1. Institute of NextGen Sustainability | Taiwan and Mainland China: The "Carbon Academy" learning zone was established at the end of 2024 to internalize carbon management as a core employee competency. To meet the carbon, water footprint, and resource recycling requirements of global supply chains, it was upgraded to the "Institute of NextGen Sustainability" in 2026. Its courses cover environmental sustainability, AI applications, just transition, and operational resilience, internalizing carbon management as a core competency of employees. The completion rate among all employees was approximately 72.25%. 2. Skills for Green Jobs | Taiwan and Mainland China: The share of talents with skills for green jobs was 73% in 2025. 3. Lean Certification Program | CIMPOR: Introduces the core principles and tools of Lean Production, paired with practical applications, to help employees streamline processes. Launched in 2025 and extending to all employees within three years. Around 400 participants are planned each year; from 2025 to July 2026, 158 participants had been trained cumulatively. 4. Generative AI Application Practices | Cement and Environmental Protection Business (Asia): Aimed at supervisors

			and employees of the cement business entities and their subsidiaries on both sides of the Taiwan Strait. External legal experts and government-appointed instructors deliver dual-track training; the online track covers commercial information security compliance, one-stop productivity with the mainstream AI tools used on both sides of the Taiwan Strait, and AI Agent automated workflows, while in-person sessions are held at Group Operation Headquarters and the Hoping Plant, expanding from June 2026 to the Yingde Plant, the Suao Plant, and Ho-Ping Power Company. As of April 2026, cumulative attendance reached 1,807 online and 116 in person or via live stream, with 2,155 course hours in total. **Case Study** ■ Electric Mining Truck Training | Hoping Quarry ■ Participants: 14 trainees, representing 100% of the drivers currently operating conventional mining trucks ■ Schedule: Commencing in November 2025 and expected to extend into 2026 ■ Content: In response to the low-carbon transition, AI-driven autonomous electric mining trucks are being introduced. To deliver a just transition and safeguard the employment rights of existing staff, a multi-year competency shift covering four stages — fundamentals and hardware, hands-on practice and tuning, maintenance and troubleshooting, and collaboration and optimization — is being carried out to build practical capability For more details on training and education, please refer to pages 37, 133-139, and 213 of the 2025 TCC Group Holdings Sustainability Report.
	Working	Prevention	**Wage and Benefits Management Measures**

	Hours / Wage and Benefits		■ TCC integrates local commodity prices and living costs to establish a fair and transparent salary structure, and dynamically optimizes remuneration levels through regular benchmarking against public data; referring to local commodity prices and living costs, TCC proposes a fair wage concept and continuously reviews local living costs and remuneration structures, moving step by step toward “decent work.” ■ Employee remuneration is determined by comprehensive factors such as performance and job responsibilities, without differential treatment on the basis of gender (including sexual orientation), race, class, age, marital status, language, thought, religion, political party, place of origin, birthplace, appearance, facial features, or physical or mental disability. **Working Hours Management Measures** ■ Taiwan: Employees at office locations and at overseas subsidiaries may adjust their working hours as needed, with flexible attendance intervals provided (including the subsidiaries CIMPOR, OYAK Cement, NHOA Energy, and Atlante) ■ NHOA Energy: Released the Family Working Manifesto, offering temporarily reduced working hours with proportionally adjusted salary, as well as flexible part-time plans ■ Reduced working hours for childcare: In response to the Taipei City Government’s “Reduced Working Hours for Childcare” program, employees meeting the criteria announced by the government have their daily working hours reduced by one hour with no reduction in pay; the program was launched in July 2026. **Actions taken:** ■ Employee Savings Mutual Fund

			(Taiwan): TCC encourages employees to save, adjusting the savings amount according to age, with deposits made every January and July. The Employee Welfare Committee matches 50% of that amount, and the two are jointly deposited into the employee welfare trust account. In 2025 the fund was used by 1,363 people, with a cumulative amount exceeding NT$2 million. ■ Employee Stock Option Plan (Taiwan): TCC launched the Employee Stock Option Plan (ESOP) in 2019. Employees contribute a fixed amount from their monthly salary and the Company provides a 1:1 matching contribution, jointly deposited into a dedicated trust account. Participating employees may also apply twice a year for a lump-sum increase in their holdings, with TCC contributing an additional 10% of that self-contribution into the individual trust account. Employees retiring at the age of 60 receive multiplied contributions. The ESOP participation rate is 92%. For more details on working hours and on wage and benefits management measures, please refer to pages 140-143 of the 2025 TCC Group Holdings Sustainability Report.
	Occupational Health and Safety	Remediation and Prevention	**In 2025, there was 1 significant penalty case for violations of Occupational Health and Safety (OHS) regulations** (defined as any single penalty with an amount exceeding US$10,000). The related remediation and subsequent preventive measures are described below: **Management System** ■ The Group has formulated the "Occupational Safety and Health Policy Statement" to ensure that safety management is implemented to a consistent standard across all global operating sites.

			■ Sites in Taiwan and Mainland China have established “Internal Control Policies for Occupational Safety and Health Management,” which apply to cross-business-group employees, dispatched outsourced workers, and contractors. The related regulations include the “Occupational Safety and Health Management Regulations,” the “Occupational Safety and Health Management Plan,” and the “Occupational Safety and Health Code of Practice,” with a safety culture driven through behavior-oriented management. ■ Cement and Environmental Protection Business (Europe-Africa) further specifies the importance of occupational safety in its Integrated Management System Policy, with global sites committed to achieving a zero-injury vision. **Linking Occupational Safety Indicators to Remuneration** ■ Performance bonuses for the management team and for first-level supervisors of the functional units at Group Operation Headquarters are subject to deductions based on occupational safety performance; at CIMPOR, 10% of variable remuneration for all employees is directly linked to occupational safety performance; OYAK Cement issues bonuses through an occupational safety and health incentive program. **Governance and Oversight** ■ Occupational safety performance and improvements are regularly reviewed at senior management meetings. TCC’s monthly meeting is chaired by the Chairman, where occupational safety status and improvement plans are a standing agenda item, and the resolutions reached apply to all global

			sites. ■ Plant-level occupational safety and health committees are in place, with labor representatives accounting for at least 33%; sites in Taiwan and Mainland China meet quarterly and monthly respectively to track implementation results. ■ Since 2025, each plant has formed a “Safety Improvement Promotion Team”; the Occupational Safety and Health Office convenes a monthly occupational safety meeting to drive and implement improvements in occupational safety at plants on both sides of the Taiwan Strait, with reward and punishment mechanisms approved by the President holding responsible personnel accountable. **Education and Training** ■ Each year TCC organizes labor, occupational safety, and disaster prevention training in accordance with prevailing government regulations, and regularly arranges initial and refresher certification training for colleagues in areas such as first aid, oxygen-deficient operations, hazardous equipment, and occupational safety and health affairs management ■ In 2025, TCC’s global cross-business occupational safety education and training recorded cumulative training participants of 66,261 employees and 13,719 contractors, and cumulative training hours of 110,536 for employees and 19,030 for contractors **Hazard Identification and Risk Assessment Process** 1. Identify all hazard sources 2. Identify potential risks, hazards, and consequences 3. Verify existing protective measures

			4. Assess hazard risks and implement hierarchical risk control 5. Conduct control measures to mitigate risks 6. Confirm residual risks after implementing control measures and continue to track and manage them **Occupational Safety Reporting Mechanism** ■ Occupational Safety Weekly Report: routinely tracks occupational injury data, safety and health audit deficiencies and improvement results, contractor violations and handling outcomes, and the implementation of safety and health education and training ■ Occupational Accident Reporting Platform: replaces email reporting with a platform to unify reporting channels; reporting is completed within one hour of an accident; an integrated form design has been introduced **Right to Stop Work and Evacuate** ■ Employees who identify an imminent risk of danger while performing their duties may stop work on their own initiative and evacuate to a place of safety **Incident Investigation and Remediation** ■ Work injury and fatality process: after a major occupational disaster, the incident is immediately reported to the Occupational Safety and Health Office and to superior supervisors, with contractors reporting by telephone within 30 minutes; plants in Taiwan report to the local labor inspection authority within 8 hours and plants in Mainland China within 1 hour ■ Cause investigation: the Occupational Safety and Health Office establishes an "Occupational Accident Investigation Taskforce" to conduct on-site inspections together with labor

			representatives and department heads, and convenes a review meeting within one week of submitting the "Accident Prevention Report" to the President ■ Near-miss incidents: reporting is completed on the same day and the details are registered in the "Investigation Form of Near-Miss Incidents"; the Occupational Safety and Health Office reviews the completeness of source management and improvement measures and provides an explanation at the monthly occupational safety meeting ■ In 2025, minor occupational safety incidents at global sites involved falls, minor sprains, flying objects, falling from height, and collisions; the main causes were insufficient employee safety awareness, glass without anti-collision markings, and failure to work in accordance with regulations. Rather than addressing single points, all sites are comprehensively implementing adjustments to work content, education and training, increased audit frequency, and improved office environment design **Case Study: Heat Hazard Project** ■ Building on the supplier survey results of TCC's 2024 human rights and environmental due diligence, the "Heat Hazard Project" was launched; since 2024, a systematic high-temperature protection mechanism has been established for outdoor workers (including employees and contractors) at the plants and quarries of Cement and Environmental Protection Business (Asia) ■ Source environmental protection takes priority: dedicated shaded rest areas have been added and sufficient water dispensers or bottled water are strictly required around operational hot spots,

			supplemented by high-temperature operational safety advocacy ■ High-temperature allowances are issued: from June to October each year at plants in Taiwan and from July to September each year at plants in Mainland China, calculated on the basis of work attendance days regardless of temperature levels, with a cumulative issuance of approximately NT$10.74 million For more details on occupational safety and health, please refer to pages 145-150 of the 2025 TCC Group Holdings Sustainability Report.
	Freedom of Association / Collective Bargaining	Prevention	■ Establishment of unions and labor agreements: TCC has legally established labor unions and signed labor agreements at all of its plants worldwide. ■ Equal protection: in Taiwan, the protection scope of all collective agreements and work rules covers all colleagues, ensuring that employees are not treated differently on the basis of their willingness to join a union or differences in conditions. ■ Labor-management meeting mechanism: each site regularly holds labor-management and union meetings to exchange views on operational and labor issues. ■ Union coverage: since 2024, the proportion of employees who have joined a union at Cement and Environmental Protection Business (Asia) and the Energy for Social Transformation Business has exceeded 90% of the total workforce. For more details on labor-management communication, please refer to page 155 of the 2025 TCC Group Holdings Sustainability Report; for union and collective agreement participation, please refer to page 215.
	Forced Labor /	Prevention	■ Policy basis: TCC has established a

	Human Trafficking / Child Labor		Human Rights Policy providing for the strict prohibition of child labor, human trafficking and forced labor, and strictly complies with labor-related laws and regulations applicable in countries where the Company conducts its business. The Policy applies to the Company and its subsidiaries, joint ventures, other affiliates having any substantial controlling or subordinate relationship with the Company in Taiwan or overseas as well as suppliers and business partners; the persons covered include contract employees and interns. ■ Statement of principle: TCC strictly adheres to the principles of prohibiting child labor, human trafficking, and forced labor, and complies with all regulations relating to wages and working hours, ensuring the timely payment of fair wages while providing a working environment that promotes health and safety. ■ Preventive measures: at sites in Taiwan and Mainland China (across business groups), the Human Rights Policy forms part of the mandatory annual training program, and all employees are required to read the policy documents and complete the assessment each year; Cement and Environmental Protection Business (Europe-Africa) also incorporates human rights-related policies and requirements into the Code of Business Ethics Acknowledgement, which new employees are required to sign. ■ Human rights training hours: Cement and Environmental Protection Business (Asia), OYAK Cement, and Atlante recorded a combined total of 2,921.5 training hours and 7,464 participants. ■ Third-party audits: since 2025 TCC has adopted the Responsible Business Alliance (RBA) Code of Conduct. E-One Moli Corporation in the Battery Energy

			Business achieved RBA Silver recognition in 2026 following a third-party on-site audit, confirming the implementation of the five core areas of the RBA Code of Conduct: Labor, Health and Safety, Environment, Ethics, and Management Systems. ■ Grievance and remediation: please refer to Table 10. ■ For more details on human rights protection, please refer to pages 151 and 153 of the 2025 TCC Group Holdings Sustainability Report; for risk governance and the adoption of the RBA, please refer to page 44; for the RBA Silver recognition, please refer to page 129.
Female Employees	Bullying and Harassment Privacy	Prevention	■ Policy basis: the “Anti-Discrimination, Anti-Harassment and Anti-Bullying Complaint and Disciplinary Procedures” apply to all of TCC’s global operating sites and follow the relevant ILO conventions and local laws; all global subsidiaries adopt this policy as a guiding principle in formulating their local implementation measures. ■ Preventive measures: the policy forms part of the mandatory annual training program, with all employees required to read it and complete the assessment; regular training reinforces awareness of anti-discrimination, anti-harassment, and anti-bullying. Cement and Environmental Protection Business (Europe-Africa) incorporates it into the Code of Business Ethics Acknowledgement, which new employees are required to sign. ■ Grievance and remediation: an online friendly workplace platform and an employee feedback email are available; cases are handled confidentially by dedicated personnel, with the personal data and privacy of complainants protected in accordance with the law; an appeal review committee has been established to ensure that cases are

			handled appropriately, professionally, and impartially and to prevent unfair retaliation or treatment. ■ Measures strengthened in 2026: 1. Regulatory background: a dedicated chapter, Prevention of Workplace Bullying, has been added to the Occupational Safety and Health Act, and the Regulations for Workplace Bullying Prevention Measures took effect on July 1, 2026. 2. TCC held a “Friendly Workplace Group Professional Competency Workshop,” a two-day, full-day course for members of the friendly workplace group and members of the appeal review committee. 3. The course was delivered by representatives of the competent authority, professional lawyers, and counseling psychologists, covering the laws and regulations governing employment discrimination, sexual harassment, and workplace bullying; the latest legislative trends and corporate responsibilities; case investigation procedures and practical operation; coordination, handling, and organizational restoration; and the creation of a healthy and friendly workplace. It was delivered in person and supplemented with group exercises and group investigation reports. For more details, please refer to page 153 of the 2025 TCC Group Holdings Sustainability Report.
	Diversity and Equality	Prevention	**Gender Diversity and Inclusion** ■ Equal employment and recruitment: TCC sets targets for the proportion of female employees and strictly adheres to the principle of equal employment throughout recruitment, focusing on candidates’ abilities and potential, breaking traditional restrictions based on gender, educational background,

			and field of study, and complying with local regulations and labor norms at each operating site to provide equal employment opportunities. ■ Eliminating recruitment bias: for recruitment at sites in Taiwan and Mainland China, a self-developed AI resume talent analysis system matches talent expertise through big data computing, effectively eliminating the unconscious bias that may arise from manual review; global sites rigorously review recruitment content, using gender-neutral expressions or non-binary language to eliminate gender stereotypes at source. ■ Gender equality governance: Atlante published its first gender equality policy in 2026, incorporating diversity, equity, and inclusion into corporate governance based on the framework of UNI/PdR 125:2022, the national standard guidelines for gender equality management in Italy, where its headquarters is located. Atlante has established a Gender Equality Committee responsible for overseeing policy implementation, KPI monitoring, and continuous improvement, ensuring that fair recruitment, equal pay, and career development mechanisms are implemented in daily management. **Maternal Protection and Friendliness** ■ Nurse care services | Taiwan: pregnant colleagues are scheduled for one interview during pregnancy and one after childbirth, with occasional telephone contact to provide health education consultations. ■ Lactation rooms | All operating sites: lactation rooms are available for unlimited use during milk collection times, which are counted as regular working hours. Under Taiwan's regulations, employers grant an additional hour of lactation time each

			day to employees who personally breastfeed children under the age of two. ■ Paid lactation leave | Atlante: eligible colleagues in Italy are entitled to two hours of lactation leave per day. ■ Childbirth bonuses and cash gifts | Taiwan: NT$10,000 for the first child, NT$20,000 for the second, and NT$50,000 for the third; Mainland China, CIMPOR, and OYAK Cement also refer to local practices and living consumption levels to provide corresponding childbirth cash gifts and support measures. **Gender Equality Advocacy** ■ In 2025, CIMPOR and OYAK Cement jointly sponsored the Turkish female boxer Dilara Yücel, promoting equal access to resources and rights for talent of all genders in sports and in wider society. **Key Data** ■ The share of women in the total workforce was 23%, the share of women in management positions 18%, the share of women in junior management positions 18%, the share of women in top management positions 13%, the share of women in management positions in revenue-generating functions 25%, and the share of women in STEM-related positions 21%. The statistical scope covers Cement and Environmental Protection Business (Asia), Molicel, and NHOA Energy, but excludes the Longshan Cement Plant, the Liuzhou Plant, and Feng Sheng Enterprise Company. For more details on gender diversity and inclusion, please refer to page 154 of the 2025 TCC Group Holdings Sustainability Report; for maternal protection and family

			care support, please refer to page 143.
Migrant Workers / Female Migrant Workers	Freedom of Thought, Conscience and Religion, Freedom of Expression, Forced Labor / Human Trafficking, Bullying and Harassment, Discrimination / Diversity and Equality, Occupational Health and Safety, Working Hours, Whistleblower Protection	Prevention	The Group's principal business entity employing migrant workers is Molicel of the Battery Energy Business. The prevention and mitigation measures for the material human rights issues affecting migrant workers are described below: ■ **Policy basis:** Molicel of the Battery Energy Business refers to TCC's Human Rights Policy and has established management mechanisms in accordance with the Responsible Business Alliance (RBA) Code of Conduct, covering onboarding training, job guidance, living support, communication and grievances, and the protection of rights. ■ **Workplace integration:** pre-departure orientation is arranged before entry into Taiwan, covering advocacy of the RBA zero recruitment fee policy, employment rules, an introduction to the living environment, and an explanation of related rights; training for new hires on the day they report for duty covers general occupational safety and health, internal rules and regulations, codes of conduct, employment conditions, and labor-related regulations. Interpreters are arranged throughout the training so that it is delivered in a language migrant workers can understand; once on the work site, experienced colleagues of the same nationality act as job mentors. ■ **Living support:** well-equipped employee dormitories are provided, with shared social and rest areas and round-the-clock management personnel to implement access control and safety maintenance; a commissary is provided at the dormitory and on the Company premises, and group catering takes account of food hygiene, nutrition, and the dietary habits of different cultural backgrounds.

			■ **Health care:** free annual health examinations are provided for migrant workers, followed by health guidance and explanations from the Company's medical personnel; resident occupational physicians conduct regular interviews to implement preventive health care and workplace health protection. ■ **Diversity and inclusion:** cultural experience and festival activities are held regularly, and a series of diversity and inclusion activities invites local and foreign employees to take part together, creating a friendly, inclusive, and non-discriminatory working environment; prayer rooms are provided at the employee dormitories and on the work site in respect of diverse religious beliefs. ■ **Communication and grievances:** company policies, employee codes, work instruction manuals, and related management rules are provided in migrant workers' native languages; physical grievance and suggestion boxes are placed in the plant area and the dormitories, alongside email, Line Official Account, a contact telephone number, a friendly communication platform, and other channels. Briefings are held regularly on government regulations and the rights of migrant workers, and symposiums for migrant workers are held regularly. The needs identified in migrant workers' work and daily life are proactively understood, then compiled, classified, and tracked in accordance with internal management procedures, with the outcome fed back to them. ■ **Protection of rights:** Molicel complies with the RBA Code of Conduct and relevant labor regulations to protect the working conditions and fundamental human rights of migrant workers, including lawful employment,

			reasonable working hours, and no restrictions of any kind on their freedom of movement. As migrant workers may ride motorcycles to and from work, the Company has strengthened its advocacy on road safety and traffic regulations to reduce commuting risk. ■ For more details on the care of migrant workers and the protection of their rights, please refer to the Molicel 2025 ESG Report.
Communities	Environmental Degradation / Waste / Land Use	Remediation and Prevention	Significant penalty cases for violations of regulations relating to this issue totaled 12, with fines of NT$28.136 million in aggregate (a significant environmental penalty event is defined as any single penalty with an amount exceeding US$10,000). The related remediation and subsequent preventive measures are described below: **Environmental Management Process** ■ STEP 1: Implement ISO systems (ISO 50001, ISO 46001, ISO 14001, ISO 14046, ISO 14064, ISO 14067) ■ STEP 2: Set environmental management targets (covering energy efficiency, water efficiency, waste reduction, air pollution reduction, and greenhouse gas reduction) ■ STEP 3: Develop action plans ■ STEP 4: Build employee capability ■ STEP 5: Communicate TCC's environmental protection policy and related requirements to all internal and external stakeholders (including employees, customers, affiliates, suppliers, and investors) through multiple channels, and engage with stakeholders (the TCC sustainability e-newsletter, supply chain conferences, product promotion events and launches at the RMC plants, and similar activities) **Air Emissions Management** ■ TCC strictly controls process air

emissions across its business entities, covering the management of stationary pollution sources, process equipment, transportation, and every other stage. It regularly commissions third-party organizations to test air quality and environmental impacts, and has set up air quality monitoring stations around its plants to ensure compliance with government emission standards.

- The global cement plants of the cement and environmental business and Ho-Ping Power Company are all equipped with continuous emission monitoring systems (CEMS) for air pollutants, which monitor in real time the concentration and volume of air pollutants in plant emissions; sites in Taiwan and Mainland China are additionally connected in real time to the local environmental competent authorities, while CIMPOR and OYAK Cement also operate within local regulations.
- 2030 air pollution emission intensity

Air Pollutant	Cement and Environmental Protection Business (Asia)	Cement and Environmental Protection Business (Europe-Africa)
NOx	≦370 g/t clinker	< 500 g/t clinker
SOx	≦39 g/t clinker	< 200 g/t clinker
TSP	≦20 g/t clinker	< 5 g/t clinker
Mercury	—	< 0.005 g/t clinker

Waste Management

- TCC's global sites follow the ISO 14001 environmental management system and have established waste management procedures to implement

			waste sorting and management and to recycle recoverable waste, while raising awareness of and action on resource recycling through employee education and training on waste reduction. ■ 100% of OYAK Cement's plants have obtained Türkiye's Zero Waste certification ■ Annual waste targets (Cement and Environmental Protection Business (Asia)) ■ 0.5% annual reduction in in-house household waste (cement plants and RMC plants) ■ 100% of in-house waste converted into recycled energy and resources (cement plants) **Case Study: Food Waste Processing Centers at the Hoping Plant and the Yingde Plant** ■ The Hoping and Yingde plants promote food waste recycling and reuse, converting food waste into fertilizer or soil improvement materials that are returned to local neighborhoods. In 2021 the Hoping Plant established food waste recycling equipment that converts food waste from the TCC DAKA park and from food stalls in the surrounding community into soil improvement materials, provided free of charge to villagers for agriculture and gardening. ■ The Yingde Plant has built an integrated food waste treatment center that recycles food waste generated by the employee canteen and by residents of nearby villages to produce organic fertilizer, soap, hand wash, crayons, and other products. From 2020 to the end of 2025, the Hoping and Yingde plants invested a cumulative NT$24,348,857. For more details on environmental management, please refer to pages 109-110

			and 115-116 of the 2025 TCC Group Holdings Sustainability Report.
	Water Resources	Prevention	**Water Resource Risk Identification** ■ To comprehensively grasp water resource risks, TCC follows the Taskforce on Nature-related Financial Disclosures (TNFD) framework, prioritizing the Cement and Environmental Protection Business (Asia) and Cement and Environmental Protection Business (Europe-Africa) groups, to identify the extent to which its global quarries and operating sites depend on and affect water flow maintenance and water quality. The WRI Aqueduct Water Risk Atlas is also used to confirm the level of water stress at operating sites in Taiwan, Mainland China, Europe, Türkiye, and Africa; a total of 108 sites are located in high water stress areas. ■ The physical risk faced by each plant is primarily that water shortages could lead to rationing and production halts, while transition risk covers stricter wastewater discharge regulations, where violations could result in fines or suspension of operations. Poor management could also affect domestic and agricultural water supplies and the natural ecology in surrounding areas, with an impact on community development and the environment. **Water Withdrawal Management Mechanisms** ■ Rainwater recycling and reuse (selected cement plants and RMC plants in Mainland China, CIMPOR and OYAK Cement cement plants, Ho-Ping Power Company, Hoping EcoPort) ■ Establish water metering systems to monitor water consumption data (cement plants, RMC plants) ■ Regularly inspect pipelines for aging and leaks (cement plants, RMC plants)

			■ Install additional filters and monitoring equipment to increase condensate recovery (Ho-Ping Power Company) ■ Replace equipment with water-saving models and install automated landscape watering systems (Ho-Ping Power Company) **Wastewater Management Mechanisms** ■ 100% of process wastewater recycled and reused with zero discharge (Taiwan RMC plants, Mainland China cement plants and the Fuzhou grinding station) ■ Establish a remote monitoring platform for runoff wastewater (Taiwan RMC plants) ■ Install shipboard sewage treatment devices, discharge systems, and equipment complying with international marine environmental protection standards, and obtain the International Sewage Pollution Prevention Certificate (ISPPC) (Ta-Ho Maritime) ■ Regularly test wastewater discharge indicators (Taiwan and 7 cement plants in Mainland China, the Liuzhou grinding station, Ho-Ping Power Company) ■ Regularly monitor wastewater treatment and pollution prevention measures, with continuous tracking and review (Taiwan and 8 cement plants in Mainland China, Ho-Ping Power Company) For more details on water resource management, please refer to pages 113-114 of the 2025 TCC Group Holdings Sustainability Reportthe; for environmental management targets, please refer to page 110; for site-level water risk and adaptation, please refer to page 113.
	Biodiversity	Prevention	■ **Overall approach:** TCC has established a Biodiversity Group under the Corporate Sustainable Development Committee. Following the TNFD LEAP

			methodology, it systematically inventories the dependencies and impacts of the global operational value chain on natural capital, establishes management strategies and priorities for action, identifies risks and opportunities, and finally conducts the related financial assessments, elevating nature issues from the level of environmental management to that of corporate strategy and risk governance. Since 2023, TCC has progressively aligned its nature conservation actions with the international TNFD transition plan guidance and published a TNFD Report presenting the related performance, responding to international nature initiatives with concrete actions and results. ■ **Assessment scope:** the analysis boundary has expanded from the Hoping 3-in-1 industrial park (port, power plant, and cement plant) in 2023, to Cement and Environmental Protection Business (Asia) and its suppliers in 2025, and further in 2026 to the global owned operating sites of all business groups together with the suppliers of Cement and Environmental Protection Business (Asia), totaling 390 sites across Taiwan, Mainland China, Türkiye, Portugal, Cameroon, Ivory Coast, and other locations. The scope of analysis covers upstream (quarries, port areas), owned operations (quarries, cement plants, RMC plants, grinding stations, offices, gypsum plants, dry-mix mortar plants, paper bag plants, renewable energy sites, battery plants, aggregate plants), downstream (shipping stations, port areas, environmental technology companies), and adjacent areas within two kilometres of these sites; supplier sites are those on the Science Based Targets Network (SBTN) high-risk list of

			Cement and Environmental Protection Business (Asia). ■ **Comprehensive analysis and priorities for action:** TCC gives priority to managing sites of very high (VH) natural sensitivity. Because VH sites are located close to nationally important ecosystems and contain many threatened species, poor management can trigger degradation of environmental resilience, readily aggravating the impact of natural disasters and causing operational losses. TCC's VH sites are concentrated in upstream quarries and owned plants, and are further cross-assessed against ENCORE level 5 operational types in order to understand the dependencies and impacts of different types of operation on natural capital. Adaptation strategies and action measures are formulated at the same time, so as to reduce environmental impacts and help restore biodiversity in the surrounding areas. For more details on biodiversity conservation, please refer to pages 157-185 of the 2025 TCC Group Holdings Sustainability Report.
	Climate Change	Prevention	**Carbon Reduction Targets and Net Zero Pathway** ■ TCC completed its SBT target setting in 2020, becoming the first cement company in East Asia to commit to and pass SBTi validation. In January 2025, both Cement and Environmental Protection Business (Asia) and Cement and Environmental Protection Business (Europe-Africa) passed the 1.5°C validation and committed to a 2050 net-zero plan. In March 2026, TCC further submitted net-zero targets on a group-wide, consolidated financial statement basis, which are under official SBTi validation; in the same month, the Charging and Storage

			Business (Europe) also completed the setting of its near-term 1.5°C target. ■ In 2024, TCC completed the "2050 Net Zero Pathway for the Global Cement and Environmental Business," covering all sites in Taiwan and Mainland China as well as CIMPOR and OYAK Cement. It follows the SBT 1.5°C methodology and the ISO IWA 42 net-zero guidelines and refers to the IEA's net-zero pathway report and World Energy Outlook, with alternative clinker, alternative raw materials, alternative fuels, waste heat recovery, process improvements, renewable energy, and carbon capture as its carbon reduction strategies, and natural carbon sinks as a feasible option for net-zero carbon removal. TCC will continue to plan a group-wide net-zero pathway in 2026. **Physical Climate Risk and Community Adaptation** ■ TCC analyzed its operating sites in Taiwan and Mainland China with reference to national meteorological observations, the IPCC SSP1-2.6 low-emission and SSP5-8.5 very high emission scenarios, and disaster risk databases, quantifying the likelihood and severity of physical risks. For the CIMPOR and OYAK Cement plants, the World Resources Institute (WRI) Aqueduct Global Flood Analyzer was used to review the flood risk that each site could face from extreme precipitation events under different scenarios in 2030 and 2050. ■ In response to the frequency and intensity of extreme precipitation events, TCC has built detention and desilting basins and installed two-meter earth embankments on quarry slopes to mitigate the impact of flooding; the RMC plants have emergency response procedures in place, the cement plants have typhoon

			and flood response plans, and flood control teams have been formed at the plants to hold regular drills and step up inspections. TCC will conduct regular flood disaster simulations for these sites in the future to enhance the plants' adaptation measures. **Just Transition and Community Empowerment** ■ Through internal workshops, TCC has inventoried the stakeholders affected by the net-zero transition and identified employees, local communities, suppliers, and consumers as those principally affected at present, and has launched a number of action strategies. In line with the needs of grid stability in Taiwan, Ho-Ping Power Company will decommission its coal-fired units no later than 2040. ■ TCC has launched the "AI Empowerment Initiative," reaching He-Ping Elementary School and Dong'ao Elementary School near its production sites to learn about generative AI, the operation of unmanned inspection drones, and smart quarries together with teachers and students. Over the summer the program extended to Heping Village and Aohua Village, helping mothers and elders in the community master mobile AI search and real-time translation and bridge the digital divide, and helping middle-aged residents use AI tools to enhance their workplace capabilities. ■ TCC DAKA Open Ecological Circular Factory is open 24 hours a day and operates on a non-profit basis, with its market supporting entrepreneurship among tribal residents through low-cost stalls. TCC Green Energy has combined its solar sites in the Budai and Yizhu areas of Chiayi with aquaculture, establishing a dedicated

			aquaculture team to work with local aquaculture farmers and pioneering the first traceability certification for an aquavoltaic site in Chiayi County. For more details on climate governance and risk management, please refer to pages 67-75 of the 2025 TCC Group Holdings Sustainability Report; for carbon reduction targets and the net-zero pathway, please refer to pages 31-32; for the just transition plan, please refer to pages 37-38.
Indigenous Peoples	Indigenous Rights	Prevention	■ **Communication and engagement mechanisms:** in 2019, in response to the expectations of the Hualien County Government, TCC proposed a privately initiated BOO project for cement kiln co-processing of Hualien's household waste. Faced with concerns from the surrounding tribal communities, TCC made field visits, took part in tribal village games and traditional festivals, and entered into dialogue with opinion leaders, establishing channels of communication with the community and opening the gates of the Hoping Plant by reorganizing part of the plant area for public access — and so TCC DAKA was born. ■ **Tribal co-decision governance:** the Hoping Sustainable Charity Foundation was established in October 2022. Following the tribal tradition of collective decision-making, the Hoping Village chief and three indigenous chairpersons serve as its directors, and dedicated funds are used to support families facing accidents, misfortune, or hardship. In 2023 the initiative was extended to Ho-Ping Power Company with the establishment of a "Maritime Emergency Relief Fund," which supports fishermen and their families under the Suao District Fishermen's Association. ■ **Local empowerment and employment:** TCC upholds local hiring

			and has established the DAKA Market as an incubator for entrepreneurship among tribal residents, providing employment opportunities outside manufacturing together with training in space and display design, photography, and marketing to help market partners strengthen their operating capabilities; through digital empowerment, some partners have successfully opened up e-commerce markets and even started businesses elsewhere. On a non-profit basis, TCC allocates a percentage of the revenue from DAKA guided tours and market administration, together with a set percentage contributed by partner companies, to a fund that supports local education and emergency relief. ■ **Community resilience and emergency support:** after the earthquake of 3 April 2024 (the '0403 earthquake'), TCC converted the former office building of the Hoping Plant into a temporary shelter, designing barrier-free spaces, a lactation room, and other facilities for the needs of the elderly, women, and children, and had it incorporated into the emergency shelter system of the Xiulin Township Office — the first instance of a company proactively supporting disaster prevention. TCC has also established a Home Repair Service Center which, in view of the scarcity of repair resources in rural areas, provides basic parts free of charge and assists with repairs; the service was extended to the Suao Plant in 2024. The Hoping Care Bus, launched in 2023, transports elderly residents and villagers of Heping Village to and from town every day to meet their medical, administrative, and shopping needs, and added a stop at Aohua Village in August 2025. For more details on social engagement and

			local inclusion, please refer to pages 187-193 of the 2025 TCC Group Holdings Sustainability Report.
Customers	Fair Trade / Information Disclosure	Prevention	**Prohibition of Unfair Competition** ■ Maintaining a reasonable order of commercial competition is an important commitment of ethical management. TCC does not tolerate any employee undermining the mechanism of free market competition through practices that violate the Fair Trade Act, such as monopolies or coordinated market allocation. **Product Health and Safety Management** ■ TCC pays close attention to and fulfills its duty to safeguard customer rights, referring to the OECD Guidelines for Multinational Enterprises in exercising strict control over customer health and safety in relation to its products and services, as well as over marketing and labeling. ■ The global plants of the cement and environmental business conduct regular product testing to ensure that products meet health and safety standards in use. Every business group has adopted quality management procedures, product information is clearly labeled in the local language, comprehensive product safety information is provided to customers through product labels, packaging bags, and delivery documents, and Safety Data Sheets (SDS) are available for reference. **Product Safety Traceability System** ■ Cement and Environmental Protection Business (Asia) has established a “Product Safety Traceability System” in Taiwan, incorporating AI assistance and user-oriented design. Customers can scan a QR Code to access the mixing ratios, sources, carbon emission intensity, and inspection reports of

			concrete raw materials, disclosing product information to standards comparable with those for food traceability; integrated with the e-commerce app, the “TCC News” feature has also been launched. **Customer grievance mechanism:** please refer to Table 10 of this document For more details, please refer to pages 79 and 88-91 of the 2025 TCC Group Holdings Sustainability Report.
Suppliers’ Employees (including migrant workers)	Human rights: Child Labor, Forced Labor / Human Trafficking, Freedom of Association, Collective Bargaining, Occupational Health and Safety, Whistleblower Protection Environment: Environmental Degradation / Waste / Land Use, Water Resources, Climate Change	Prevention	**Management Process** ■ **Step 1 Risk assessment:** supplier basic data is collected and verified, with initial screening and qualification assessment carried out through the Procurement Portal; AI models are used for risk assessment and early warning, and a product life-cycle approach is applied to identify sustainability risks at each stage of the value chain. ■ **Step 2 Sustainability assessment and audit:** significant suppliers undergo desk assessment and risk grading through self-assessment questionnaires and publicly available information; on-site audits are further conducted for potentially high-risk suppliers with lower scores. ■ **Step 3 Corrective actions and improvements:** high-risk suppliers are guided by dedicated personnel to submit improvement plans and are required to submit a corrective action plan (CAP) within three months; the following year they are given priority in capacity-building projects such as sustainability governance workshops and are reviewed. Where a supplier fails to complete improvements within three months of counseling, an internal proposal is made to terminate the transaction and replace the supplier. Suppliers that still have room for

			improvement remain in the business relationship but are designated for focused guidance, receiving education and training through the online learning platform, with strengthened supervision and continuous tracking of improvement progress and effectiveness; where the standard is still not met within twelve months (a score below 60), an internal proposal is made to terminate the transaction and replace the supplier. **Training, Empowerment, and Capacity Building** ■ Capacity building program (a semi-annual project): comprising online and in-person coaching courses 1. Environmental and climate aspects: implementing ISO 14001 and ISO 14064 and holding environmental workshops 2. Quality and operational aspects: combining ISO 9001 with occupational safety workshops 3. Responsibility and governance aspects: promoting ISO 20400 sustainable procurement and responsible business conduct training, integrating human rights, ethics, and sustainable decision-making into core operations ■ Product carbon footprint intensive training camp: helping suppliers secure third-party verification resources and enhancing their practical capabilities in product carbon footprint inventories and carbon reduction strategies ■ Sustainability governance workshop: helping SME suppliers and medium-to-high-risk significant suppliers establish sustainability management systems and set policies and targets ■ Supplier sustainability learning platform: a dedicated learning platform has been established covering occupational safety heat hazards, working hours, and physical and

			mental well-being, with net-zero planning and management and carbon knowledge training introduced For more details on sustainable supply chain management, please refer to pages 84-87 of the 2025 TCC Group Holdings Sustainability Report; for human rights and environmental due diligence in the supply chain, please refer to page 152; for supplier nature risk assessment, please refer to pages 161-162.

Appendix: Mapping of International Indicators to Human Rights and Environmental Issues

Indicator	Issues
Varieties of Democracy (V-Dem)	Discrimination / Diversity and Equality, Freedom of Thought, Conscience and Religion, Freedom of Expression
ITUC Global Rights Index	Freedom of Association, Collective Bargaining
UNICEF Children's Rights in the Workplace Index	Child Labor
ILO Statistics on Child Labour	Child Labor
ILO Global Estimates of Modern Slavery	Forced Labor / Human Trafficking
UNODC Trafficking in Persons Data Portal	Forced Labor / Human Trafficking
ENCORE	Climate Change, Biodiversity, Pollutants and Waste, Environmental Degradation, Land Use, Water Resources

Note: For V-Dem, the four indices of the Political Exclusion series (Exclusion by Gender / Political Group / Social Group / Urban-Rural Location), the Freedom of Religion indicator, and the Freedom of Expression and Alternative Sources of Information index are used.

Appendix: Sources of International Indicators

- Coppedge, Michael et al. (2026). V-Dem Country-Year Dataset v16. Varieties of Democracy (V-Dem) Project. https://doi.org/10.23696/vdemds26
- International Trade Union Confederation (2026). 2026 ITUC Global Rights Index.
- UNICEF and Global Child Forum (2023). Children's Rights and Business Atlas: Children's Rights in the Workplace Index, June 2023.
- International Labour Organization. ILOSTAT database: Share of children in child labour (CLD_XCHL_SEX_AGE_RT). https://ilostat.ilo.org (accessed August 2026)
- International Labour Organization, Walk Free and International Organization for Migration (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Geneva.
- UNODC (2024). UNODC Research – Data Portal – Trafficking in Persons. https://dataunodc.un.org/dp-trafficking-persons (accessed September 2026)
- ENCORE Partners (2024). ENCORE: Exploring Natural Capital Opportunities, Risks and Exposure, October 2024. https://encorenature.org