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Third - Party Assurance Statement

AA1000 Assurance Opinion Statement



INDEPENDENT ASSURANCE OPINION STATEMENT

2024 TCC Group Holdings Sustainability Report

The British Standards Institution is independent to TCC Group Holdings (hereafter referred to as TCC in this statement) and has no financial interest in the operation of TCC other than for the assessment and verification of the sustainability statements contained in this report.

This independent assurance opinion statement has been prepared for the stakeholders of TCC only for the purpose of assuring its statements relating to its sustainability report, more particularly described in the Scope below. It was not prepared for any other purpose. The British Standards Institution will not, in providing this independent assurance opinion statement, accept or assume responsibility (legal or otherwise) or accept liability for or in connection with any other purpose for which it may be used, or to any person by whom the independent assurance opinion statement may be read.

This independent assurance opinion statement is prepared on the basis of review by the British Standards Institution of information presented to it by TCC. The review does not extend beyond such information and is solely based on it. In performing such review, the British Standards Institution has assumed that all such information is complete and accurate.

Any queries that may arise by virtue of this independent assurance opinion statement or matters relating to it should be addressed to TCC only.

Scope

The scope of engagement agreed upon with TCC includes the followings:

1. The assurance scope is consistent with the description of 2024 TCC Group Holdings Sustainability Report.
2. The evaluation of the nature and extent of the TCC's adherence to AA1000 AccountAbility Principles (2018) in this report as conducted in accordance with type 1 of AA1000AS v3 sustainability assurance engagement and therefore, the information/data disclosed in the report is not verified through the verification process.

This statement was prepared in English and translated into Chinese for reference only.

Opinion Statement

We conclude that the 2024 TCC Group Holdings Sustainability Report provides a fair view of the TCC sustainability programmes and performances during 2024. The sustainability report subject to assurance is free from material misstatement based upon testing within the limitations of the scope of the assurance, the information and data provided by the TCC and the sample taken. We believe that the performance information of Environment, Social and Governance (ESG) are fairly represented. The sustainability performance information disclosed in the report demonstrate TCC's efforts recognized by its stakeholders.

Our work was carried out by a team of sustainability report assurers in accordance with the AA1000AS v3. We planned and performed this part of our work to obtain the necessary information and explanations we considered to provide sufficient evidence that TCC's description of their approach to AA1000AS v3 and their self-declaration in accordance with GRI Standards were fairly stated.

Methodology

Our work was designed to gather evidence on which to base our conclusion. We undertook the following activities:

- a top level review of issues raised by external parties that could be relevant to TCC's policies to provide a check on the appropriateness of statements made in the report.
- discussion with managers on approach to stakeholder engagement. However, we had no direct contact with external stakeholders.
- 52 interviews with staffs involved in sustainability management, report preparation and provision of report information were carried out.
- review of key organizational developments.
- review of the findings of internal audits.
- review of supporting evidence for claims made in the reports.
- an assessment of the organization's reporting and management processes concerning this reporting against the principles of Inclusivity, Materiality, Responsiveness, and Impact as described in the AA1000AP (2018).

Conclusions

A detailed review against the Inclusivity, Materiality, Responsiveness, and Impact of AA1000AP (2018) and GRI Standards is set out below:

Inclusivity

This report has reflected a fact that TCC has continually sought the engagement of its stakeholders and established material sustainability topics, as the participation of stakeholders has been conducted in developing and achieving an accountable and strategic response to sustainability. There are fair reporting and disclosures for the information of Environment, Social and Governance (ESG) in this report, so that appropriate planning and target-setting can be supported. In our professional opinion the report covers the TCC's inclusivity issues.

Materiality

TCC publishes material topics that will substantively influence and impact the assessments, decisions, actions and performance of TCC and its stakeholders. The sustainability information disclosed enables its stakeholders to make informed judgements about the TCC's management and performance. In our professional opinion the report covers the TCC's material issues.

Responsiveness

TCC has implemented the practice to respond to the expectations and perceptions of its stakeholders. An Ethical Policy for TCC is developed and continually provides the opportunity to further enhance TCC's responsiveness to stakeholder concerns. Topics that stakeholder concern about have been responded timely. In our professional opinion the report covers the TCC's responsiveness issues.

Impact

TCC has identified and fairly represented impacts that were measured and disclosed in probably balanced and effective way. TCC has established processes to monitor, measure, evaluate, and manage impacts that lead to more effective decision-making and results-based management within the organization. In our professional opinion the report covers the TCC's impact issues.

GRI Sustainability Reporting Standards (GRI Standards)

TCC provided us with their self-declaration of in accordance with GRI Standards 2021 (For each material topic covered in the applicable GRI Sector Standard and relevant GRI Topic Standard, comply with all reporting requirements for disclosures). Based on our review, we confirm that sustainable development disclosures with reference to GRI Standards' disclosures are reported, partially reported, or omitted. In our professional opinion the self-declaration covers the TCC's sustainability topics.

Assurance level

The moderate level assurance provided is in accordance with AA1000AS v3 in our review, as defined by the scope and methodology described in this statement.

Responsibility

The sustainability report is the responsibility of the TCC's chairman as declared in his responsibility letter. Our responsibility is to provide an independent assurance opinion statement to stakeholders giving our professional opinion based on the scope and methodology described.

Competency and Independence

The assurance team was composed of auditors experienced in relevant sectors, and trained in a range of sustainability, environmental and social standards including AA1000AS, ISO 14001, ISO 45001, ISO 14064, and ISO 9001. BSI is a leading global standards and assessment body founded in 1901. The assurance is carried out in line with the BSI Fair Trading Code of Practice.

For and on behalf of BSI:


Peter Pu, Managing Director BSI Taiwan



Statement No: SRA-TW-803868
2025-07-21

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Third - Party Assurance Statement

Independent Auditors' Limited Assurance Report

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INDEPENDENT AUDITORS' LIMITED ASSURANCE REPORT

TCC Group Holdings CO., LTD.

We have undertaken a limited assurance engagement on the selected performance indicators in the Sustainability Report ("the Report") of TCC Group Holdings CO., LTD. ("the Company") for the year ended December 31, 2024.

Subject Matter Information and Applicable Criteria

See Appendix 1 for the Company's selected performance indicators ("the Subject Matter Information") and applicable criteria.

Responsibilities of Management

The management of the Company is responsible for the preparation of the Subject Matter Information in accordance with Taiwan Stock Exchange Corporation Rules Governing the Preparation and Filing of Sustainability Reports by TWSE Listed Companies, Universal Standards, Sector Standards and Topic Standards published by the Global Reporting Initiative (GRI), SASB Standards published by the Sustainability Accounting Standards Board (SASB), and the criteria specifically designed by the Company, and for such internal control as management determines is necessary to enable the preparation of the Subject Matter Information that are free from material misstatement resulted from fraud or error.

Auditors' Responsibilities

Our responsibility is to plan and conduct our limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" issued by the International Auditing and Assurance Standards Board to issue a limited assurance report on whether the Subject Matter Information (see Appendix 1) is free from material misstatement. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, therefore, a lower assurance level is obtained than a reasonable assurance.

We based on our professional judgment in the planning and conducting of our work to obtain evidence supporting the limited assurance. Because of the inherent limitations of any internal control, there is an unavoidable risk that even some material misstatements may remain undetected. The procedures we performed include, but not limited to:

- Inquiring of management and the personnel responsible for the Subject Matter Information to obtain an understanding of the policies, procedures, internal control, and information system relevant to the Subject Matter Information to identify areas where a material misstatement of the subject matter information is likely to arise.

- Selecting sample items from the Subject Matter Information and performing procedures such as inspection, re-calculation, re-performance, observation, and analytical procedures to obtain evidence supporting limited assurance.

Inherent Limitations

The Subject Matter Information involved non-financial information, which was subject to more inherent limitations than financial information. The information may involve significant judgment, assumptions and interpretations by the management, and the different stakeholders may have different interpretations of such information.

Independence and Quality Control

We have complied with the independence and other ethical requirements of the Norm of Professional Ethics for Certified Public Accountant in the Republic of China, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The firm applies Standard on Quality Management 1 "Quality Management for Public Accounting Firms" issued by the Accounting Research and Development Foundation of the Republic of China, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter Information is not prepared, in all material respects, in accordance with the applicable criteria.

Other Matters

We shall not be responsible for conducting any further assurance work for any change of the Subject Matter Information or the applicable criteria after the issuance date of this report.

Deloitte & Touche

Deloitte & Touche
Taipei, Taiwan
Republic of China

August 25, 2025

APPENDIX 1

SUMMARY OF SUBJECT MATTER INFORMATION

#	Subject Matter Information			Corresponding Section	Applicable Criteria
1.	Process	Approach	Key Performance	Stakeholder & Material Topic Analysis	GRI 3-1: 2021 Process to determine material topics
1	Identify stakeholders	TCC's key stakeholders were identified through questionnaires completed by Department heads and relevant personnel.	Identified 10 categories of stakeholders		
2	Focus on TCC's Sustainability Issues	Design a list of sustainability issues with reference to international sustainable development trends and international sustainability rating standards.	25 sustainability issues cover corporate governance, economy, environment, and people and human rights		
3	Assess the Impact of Sustainability Issues on the Economy, Environment, People, and Human Rights	Conducted a materiality assessment workshop, inviting executives at Vice President level and above to identify actual and potential positive and negative impacts. Additionally, departments distributed questionnaires to internal and external stakeholders to understand the level of impact on each issue.	337 questionnaires collected		
4	Assess the Impacts of Sustainability issues on Operation	Members of the Corporate Sustainable Development Committee, along with executives at Vice President level and above, assessed the impact of sustainability issues on operations. They determined the significance of each issue based on its severity and likelihood of its potential positive and negative impacts on TCC's operations.	8 VP-level and above supervisors discussed at management meeting		
5	Double Materiality Assessment	Summarize internal/external survey results, map double materiality matrix, link issues and TCC sustainability strategies, and decide material topics for 2024.	12 material topics identified by the Corporate Sustainable Development Committee		
6	Determine Material Topics	Submit the 12 material topics identified to the Board of Directors to ensure these material topics are aligned with the business risks and strategies of TCC.	Submitted to the Board of Directors compliance of in sustainability and integrity		
2.	Procurement Percentage in 2024			1.7 Supply Chain Management	GRI 204-1: 2016 Proportion of spending on local suppliers
		Taiwan	Mainland China		
	Local Procurement	86.31%	99.99%		
			Taiwan & Mainland China		
			93.74%		

#	Subject Matter Information			Corresponding Section	Applicable Criteria
3.	Energy Use in 2024			6.1 ESG Data Sheet	GRI 302-1: 2016 Energy consumption within the organization
	Energy Usage In terms of Gigajoule (GJ)		2024		
	Coal	Taiwan	10,806,676		
		Mainland China	53,561,704		
		Subtotal	64,368,380		
	Diesel	Taiwan	168,288		
		Mainland China	410,714		
		Subtotal	579,002		
	Gasoline	Taiwan	22,637		
		Mainland China	9,837		
		Subtotal	32,474		
	Purchased Electricity	Taiwan	1,528,627		
		Mainland China	7,097,867		
		Subtotal	8,626,494		
	Power Generation by Waste Heat Recovery	Taiwan	286,155		
		Mainland China	3,088,559		
		Subtotal	3,374,715		
	Natural Gas	Taiwan	320		
		Mainland China	0		
		Subtotal	320		
	Alternative Fuel	Taiwan	1,724,940		
		Mainland China	13,131,664		
		Subtotal	14,856,604		
	Renewable Energy	Taiwan	21,010		
		Mainland China	229,521		
		Subtotal	250,530		
	<ul style="list-style-type: none">Note 1: The newly disclosed scope in 2024 includes Longshan, Huaihua, and Liaoning cement plants; Fuzhou and Liuzhou grinding plants; Feng Sheng Enterprise Company, 123 Environmental Protection Technology Co., Ltd., Beijing TCC Environmental Technology Co., Ltd., TCC (Guangdong) Renewable Resources Technology Company Limited.Note 2: The coal calorific values for cement plants in Taiwan are converted based on each plant's specific settings. The conversion factors are as follows: Su'ao Plant - 5,532.69 kcal/kg; Hoping Plant - 5,570.14 kcal/kg; other cement plants in Taiwan - 5,512.66 kcal/kg. Conversion factors for other fuels are: diesel - 8,400 kcal/l, gasoline - 7,800 kcal/l, electricity - 3,600 GJ per million kWh, and natural gas - 8,000 kcal/m³. For Mainland China calorific values are calculated in accordance with local practices and regulations.Note 3: Energy consumption data is based on reports submitted to the Energy Administration.				

#	Subject Matter Information			Corresponding Section	Applicable Criteria		
4.	Unit: Million Liters			6.1 ESG Data Sheet	GRI 303-3: 2018 Water withdrawal		
	Items		2024				
	Water Withdrawal						
	Third-Party Water - Municipal Water	Taiwan	282				
		Mainland China	539				
		Subtotal	821				
	Third-Party Water - Industrial Water	Taiwan	1,086				
		Mainland China	586				
		Subtotal	1,672				
	Surface Water - Rivers	Taiwan	13				
		Mainland China	10,925				
		Subtotal	10,938				
	Surface Water - Mines	Taiwan	-				
		Mainland China	94				
		Subtotal	94				
	Surface Water - Lakes	Taiwan	-				
		Mainland China	137				
		Subtotal	137				
	Surface Water - Rainwater/Spring Water	Taiwan	37				
		Mainland China	967				
		Subtotal	1,004				
	Groundwater	Taiwan	1,460				
		Mainland China	263				
		Subtotal	1,723				
	Seawater	Taiwan	0				
		Mainland China	0				
		Subtotal	0				
	Discharged Reclaimed Water	Taiwan	89				
		Mainland China	-				
		Subtotal	89				
	Total	Taiwan	2,968				
		Mainland China	13,510				
		Subtotal	16,478				
Water Resource Use in Water-Stressed Areas Unit: Million Liters							
Items		2024					
Water Withdrawal							
Taiwan		-					
Mainland China		1,718					
Subtotal		1,718					
Note 1: TCC assesses future water availability using the WRI Aqueduct Water Risk Atlas. Some locations in Mainland China are situated in areas with high water stress, while the remaining sites are not located in water-stressed regions.							
5.	Unit: Million Liters			6.1 ESG Data Sheet	GRI 303-4: 2018 Water discharge		
	Items		2024				
	Water Discharge						
	Surface Water	Taiwan	464				
		Mainland China	0				
		Subtotal	464				
	Groundwater	Taiwan	0				
		Mainland China	0				
		Subtotal	0				
	Seawater	Taiwan	0				
		Mainland China	0				
		Subtotal	0				
	Third-Party Water	Taiwan	30				
		Mainland China	118				
		Subtotal	148				
	Total	Taiwan	494				
		Mainland China	118				
		Subtotal	612				
	Water Resource Use in Water-Stressed Areas Unit: Million Liters						
	Items		2024				
	Water Discharge						
	Taiwan		-				
	Mainland China		-				
	Subtotal		-				
	Note 1: TCC assesses future water availability using the WRI Aqueduct Water Risk Atlas. Some locations in Mainland China are situated in areas with high water stress, while the remaining sites are not located in water-stressed regions.						

#	Subject Matter Information				Corresponding Section	Applicable Criteria			
6.	Air Pollutant Emissions				6.1 ESG Data Sheet	GRI 305-7: 2016 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions			
	Unit: Metric Ton								
	Items	Unit	Site	2024					
	NOx	Metric ton	Taiwan	4,481					
			Mainland China	4,740					
			Subtotal	9,221					
	SOx	Metric ton	Taiwan	58					
			Mainland China	1,057					
			Subtotal	1,115					
	Particulate Matter	Metric ton	Taiwan	182					
			Mainland China	466					
			Subtotal	648					
	VOC/THC	Metric ton	Taiwan	0.0043					
			Mainland China	0.0113					
			Subtotal	0.0157					
	PCDD/F	g I-TEQ	Taiwan	0.0505					
			Mainland China	0.00000024					
			Subtotal	0.0505					
	<ul style="list-style-type: none">Emissions are calculated either through direct measurement or based on specific on-site data. The emission factors are sourced from the "Emission Factors, Control Efficiencies, and Other Measurement Regulations for Particulate Pollutants, Lead, Cadmium, Mercury, Arsenic, Hexavalent Chromium, and Dioxins from Stationary Pollution Sources in Public and Private Premises." These include Appendix 1: Emission Factors for Particulate Pollutants from Industrial Processes, and Appendix 3: Emission Factors for Lead, Cadmium, Mercury, Arsenic, Hexavalent Chromium, and Dioxins from Industrial Processes, as well as emission factors, control efficiencies, and other measurement regulations for volatile organic compounds (VOCs), process units (including equipment components), as specified for the declaration of air pollution control fees for stationary pollution sources.The nature of operations at product plants involves cement product mixing and transportation; therefore, no air pollutant emissions are generated.Emissions of mercury, dioxins, and furans (PCDD/Fs) from Mainland China are disclosed starting from 2024.In 2024, additional heavy metal emissions were recorded. For Heavy Metals 1 (HM1, including thallium, cadmium, lead, arsenic, and their compounds), emissions totaled 0.7424 metric tons in Taiwan and Mainland China. For Heavy Metals 2 (HM2, including beryllium, chromium, tin, antimony, copper, cobalt, manganese, nickel, vanadium, and their compounds), emissions totaled 1.3715 metric tons in Taiwan and Mainland China.In 2024, the newly added disclosure scope included 22.17 metric tons of fluorides, 33.51 metric tons of hydrogen chloride, 3.63 metric tons of hydrogen fluoride, 115.93 metric tons of ammonia, and 16.75 metric tons of total organic carbon.								
	7.	Waste Treatment					6.1 ESG Data Sheet	GRI 306-3 2020 Waste generated	
		Unit: Metric Ton							
		2024							
		Total	Non-Hazardous Waste	Taiwan and Mainland China					34,372.11
		Hazardous Waste	Taiwan and Mainland China	557.58					

#	Subject Matter Information	Corresponding Section	Applicable Criteria																						
12.	<table><tr><td colspan="2">Supplier Assessment Performance and Goals for 2024</td></tr><tr><td>Supplier Assessment</td><td>FY 2024</td></tr><tr><td>Total number of suppliers assessed (via desk assessments/on-site assessments)</td><td>275</td></tr><tr><td>Results</td><td></td></tr><tr><td>Number of suppliers assessed with substantial actual/potential negative impacts</td><td>14</td></tr><tr><td>Number of suppliers that were terminated</td><td>2</td></tr><tr><td>Supplier corrective plan performance and targets</td><td></td></tr><tr><td>Total number of suppliers with substantial actual/potential negative impacts expected to be supported in corrective action plan implementation</td><td>14</td></tr><tr><td>Total number of suppliers supported in corrective action plan implementation</td><td>12</td></tr><tr><td>Performance and goals of suppliers capacity building programs</td><td></td></tr><tr><td>Total number of suppliers in capacity building programs</td><td>262</td></tr></table> <p>Note 1: The scope covers cement business in Taiwan and Mainland China</p>	Supplier Assessment Performance and Goals for 2024		Supplier Assessment	FY 2024	Total number of suppliers assessed (via desk assessments/on-site assessments)	275	Results		Number of suppliers assessed with substantial actual/potential negative impacts	14	Number of suppliers that were terminated	2	Supplier corrective plan performance and targets		Total number of suppliers with substantial actual/potential negative impacts expected to be supported in corrective action plan implementation	14	Total number of suppliers supported in corrective action plan implementation	12	Performance and goals of suppliers capacity building programs		Total number of suppliers in capacity building programs	262	6.1 ESG Data Sheet	<p>Specifically designed indicator 2:</p> <p>Supplier evaluation process: The number of suppliers reviewed in 2024, the number of suppliers with whom cooperation was terminated, and the number of suppliers identified as having potential/actual significant negative impact.</p> <p>Suppliers with potential/actual significant negative impact: Suppliers identified based on internal assessments as having significant actual or potential ESG negative impacts.</p>
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13.		6.1 ESG Data Sheet	<p>Specifically designed indicator 3:</p> <p>Number of Suppliers Improved: The number of suppliers with potential/actual significant negative impacts in 2024 who received support for improvement plans, implemented improvement plans, and participated in capacity-building programs.</p> <p>Suppliers Receiving Improvement Plan Support: Suppliers who responded to the company's improvement notice and expressed their willingness to participate.</p> <p>Suppliers Implementing Improvement Plans: Suppliers who received the company's improvement recommendations and underwent subsequent follow-up.</p> <p>Suppliers in Capacity-Building Programs: Suppliers who responded to the company's carbon questionnaire or participated in sustainability governance workshops.</p>																						

#	Subject Matter Information	Corresponding Section	Applicable Criteria												
14.	<div>Air Pollutant Emissions</div> <table><tr><th>Items</th><th>Unit</th><th>Site</th><th>2024</th></tr><tr><td rowspan="3">Mercury Emissions (Hg)</td><td rowspan="3">Metric ton</td><td>Taiwan</td><td>0.1729</td></tr><tr><td>Mainland China</td><td>0.2058</td></tr><tr><td>Subtotal</td><td>0.3787</td></tr></table> <ul style="list-style-type: none">Emissions are calculated either through direct measurement or based on specific on-site data. The emission factors are sourced from the "Emission Factors, Control Efficiencies, and Other Measurement Regulations for Particulate Pollutants, Lead, Cadmium, Mercury, Arsenic, Hexavalent Chromium, and Dioxins from Stationary Pollution Sources in Public and Private Premises." These include Appendix 1: Emission Factors for Particulate Pollutants from Industrial Processes, and Appendix 3: Emission Factors for Lead, Cadmium, Mercury, Arsenic, Hexavalent Chromium, and Dioxins from Industrial Processes, as well as emission factors, control efficiencies, and other measurement regulations for volatile organic compounds (VOCs), process units (including equipment components), as specified for the declaration of air pollution control fees for stationary pollution sources.The nature of operations at product plants involves cement product mixing and transportation; therefore, no air pollutant emissions are generated.Emissions of mercury, dioxins, and furans (PCDD/Fs) from Mainland China are disclosed starting from 2024.In 2024, additional heavy metal emissions were recorded. For Heavy Metals 1 (HM1, including thallium, cadmium, lead, arsenic, and their compounds), emissions totaled 0.7424 metric tons in Taiwan and Mainland China. For Heavy Metals 2 (HM2, including beryllium, chromium, tin, antimony, copper, cobalt, manganese, nickel, vanadium, and their compounds), emissions totaled 1.3715 metric tons in Taiwan and Mainland China.In 2024, the newly added disclosure scope included 22.17 metric tons of fluorides, 33.51 metric tons of hydrogen chloride, 3.63 metric tons of hydrogen fluoride, 115.93 metric tons of ammonia, and 16.75 metric tons of total organic carbon.	Items	Unit	Site	2024	Mercury Emissions (Hg)	Metric ton	Taiwan	0.1729	Mainland China	0.2058	Subtotal	0.3787	6.1 ESG Data Sheet	Specifically designed indicator 4: Mercury Emissions in 2024
Items	Unit	Site	2024												
Mercury Emissions (Hg)	Metric ton	Taiwan	0.1729												
		Mainland China	0.2058												
		Subtotal	0.3787												