

2025 Human Rights Due Diligence Report

winbond

A Global Supplier of
Advanced Solutions

Introduction

Winbond is committed to upholding and promoting human rights by providing a safe, healthy, and ethical workplace that supports corporate integrity and sustainable development.

To strengthen our human rights risk management framework, Winbond conducted its first human rights due diligence assessment in Taiwan in 2022 with the support of an independent third party. Building on this foundation and driven by our commitment to continuous improvement and sustainability, we launched a second assessment in 2025, expanding the scope to include our global subsidiaries.

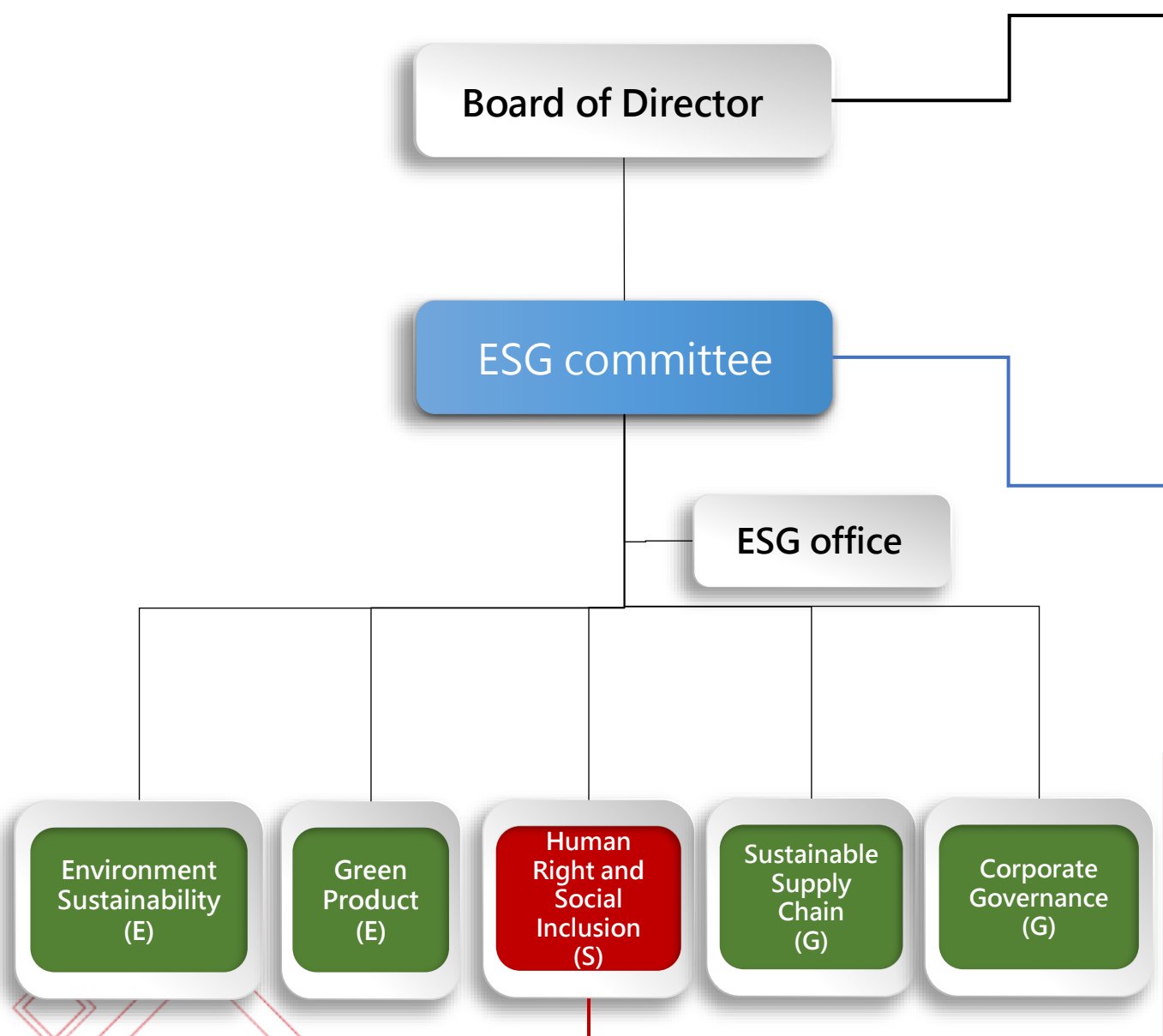
This expanded assessment reflects our ongoing efforts to identify, prevent, and mitigate human rights risks across our operations, while enhancing stakeholder awareness and fostering a culture of respect for human rights throughout the organization.





- Human Rights Governance
- Human Rights Commitment
- Human Rights Due Diligence
 - 1) Assessment Period and Scope
 - 2) Investigation Process
 - 3) Coverage Rate
 - 4) Summary of Human Rights Assessment
 - 5) Human Rights Risk Issues and Stakeholders
 - 6) Human Rights Risk Matrix
 - 7) Risk Mitigation and Remediation Measures
- Supply Chain Sustainability Due Diligence - Human Rights

Human Rights Governance



Board of Director

In 2015, Winbond established the "Winbond Corporate Social Responsibility (CSR) Committee" as the core management body for promoting sustainable development. To elevate the organizational level to the Board of Directors, it was restructured into the "Sustainability Committee" in 2022. The Sustainability Committee regularly reports its execution results to the Board of Directors every year.

ESG committee

The Committee meets at least twice a year and is chaired by the Chairman of the Board. The purpose of the Committee is to plan Winbond's sustainable development strategies and goals, formulate corresponding action plans, integrate company resources, implement various sustainability initiatives, and enhance operational competitiveness.

Human Right and Social Inclusion

Under the Sustainability Committee, a Sustainability Office and five functional groups have been established: Environmental Sustainability, Green Products, Human Rights & Social Inclusion, Sustainable Supply Chain, and Corporate Governance. The Committee regularly reports its execution results to the Board of Directors each year to ensure the promotion and implementation of corporate sustainable development efforts.

Human Rights Commitment (1/2)

Winbond Electronics Corp. promises to abide by internationally recognized human rights standards as the highest guiding principle, including but not limited to:

- UN Guiding Principles on Business and Human Rights
- Declaration of Fundamental Principles and Rights at Work
- UN Universal Declaration of Human Rights of the International Labor Organization

Based on the above guiding principles, Winbond manages all employees, affiliated companies, related enterprises, suppliers, contractors, and partners (customers, communities), with a commitment to respecting and protecting human rights. The following important issues are of concern:

1. To abide by local laws and regulations of the operational base and provide a safe and legal working environment.
2. To continuously promote a culture of diversity and inclusion by recruiting and developing diverse talents
3. To protect the labor rights of disadvantaged groups such as women, indigenous peoples, foreign employees and people with disabilities so as to ensure equal employment opportunities , eliminate employment discrimination and avoid unequal pay for equal work.
4. To prohibit any form of forced labor, human trafficking and child labor from being employed
5. To prohibit any form of inhumane treatment, including bullying or harassment
6. To respect the freedom of expression and participation of all individuals, without any interference or restriction that hinders their rights and lawful exercise. To maintain diverse communication channels, provide complaint mechanisms, and protect the confidentiality and anonymity of complainants
7. To promise, propose, approve, give or accept bribe or other legitimate gains are prohibited
8. To purchase minerals responsibly
9. To integrate guidelines of RBA (Responsible Business Alliance) into policies and management systems, conduct regular human rights due diligence to identify and assess risks, and promote preventive/ mitigation measures and tracking mechanisms.

Chairman



Human Rights Commitment (2/2)

| Policy | Content | Download |
|--|---|----------------------|
| Human Rights Policy | Winbond Electronics is committed to upholding internationally recognized human rights standards as our guiding principles, including but not limited to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the Universal Declaration of Human Rights. We strictly implement the Responsible Business Alliance (RBA) Code of Conduct to support and safeguard human rights, while providing a safe and ethically sound working environment. | LINK |
| Sustainable Development Committee Charter | Outlines and regulates the duties, responsibilities, and subordinate organizational structure of the Sustainable Development Committee. | LINK |
| Sustainable Development Best Practice Principles | Winbond adheres to internationally recognized labor rights, including freedom of association, the right to collective bargaining, care for vulnerable groups, prohibition of child labor, elimination of all forms of forced labor, and the eradication of employment discrimination. We ensure our human resources policies are free from discrimination based on gender, race, socioeconomic status, age, marital status, or family situation, thereby realizing equality and fairness in recruitment, employment conditions, compensation, benefits, training, evaluation, and promotion opportunities. For matters jeopardizing labor rights, we provide an effective and appropriate grievance mechanism to ensure an equitable and transparent process. The grievance channels are designed to be simple, accessible, and unobstructed, with appropriate responses provided to all employee grievances. | LINK |
| Code of Ethical Business Conduct | Established to build a corporate culture of integrity and to provide a reference framework for sound development and excellent business operations. This Code explicitly prohibits unethical behavior and defines prevention methods, disciplinary actions, and grievance systems. | LINK |
| Procedures for Handling Violations of Ethical Business Conduct | Specifies the investigation procedures for violations of ethical business conduct and provides proper whistleblowing channels as well as confidentiality measures to safeguard the Company' s policy of maintaining integrity in all business activities. | LINK |
| Winbond Anti-Corruption Commitment | Winbond Electronics Corp. and its subsidiaries uphold a corporate culture of "Integrity Management," eliminate all forms of corruption, and provide reporting channels along with whistleblower protection. | LINK |

Assessment Period and Scope

Winbond's Human Rights Due Diligence (HRDD) issue framework and investigation procedures are developed and executed in accordance with the following international principles, sustainability assessments, and standards:

- The UN Global Compact
- The International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGPs)
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite Declaration of Principles
- OECD Due Diligence Guidance for Responsible Business Conduct

Assessment Period

Year 2025

Scope

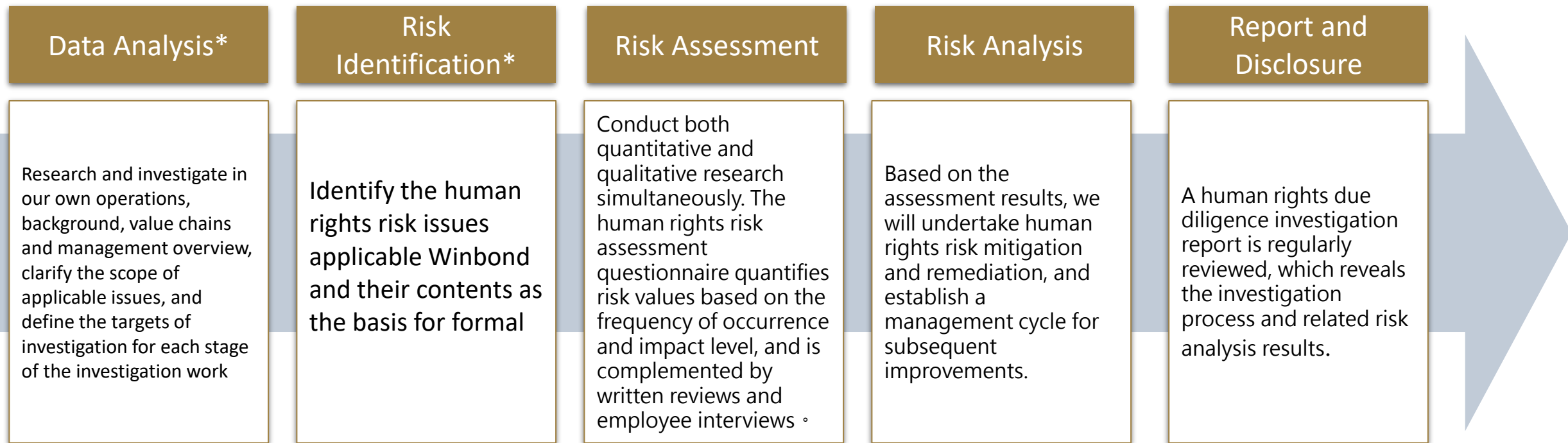
- Taiwan : Taipei Office, Jhubei Office, Central Taiwan Science Park (CTSP) Fab, Tainan Office, and Kaohsiung Fab.
- Global Subsidiaries: United States, Israel, Japan, China, Hong Kong, Germany, and India.



Investigation Process

Winbond's HRDD methodology integrates international standards with risk and sustainability management, establishing a robust framework verified by practical application. Every operational stage is tailored dynamically to the target's industry nature, organizational structure, and management model.

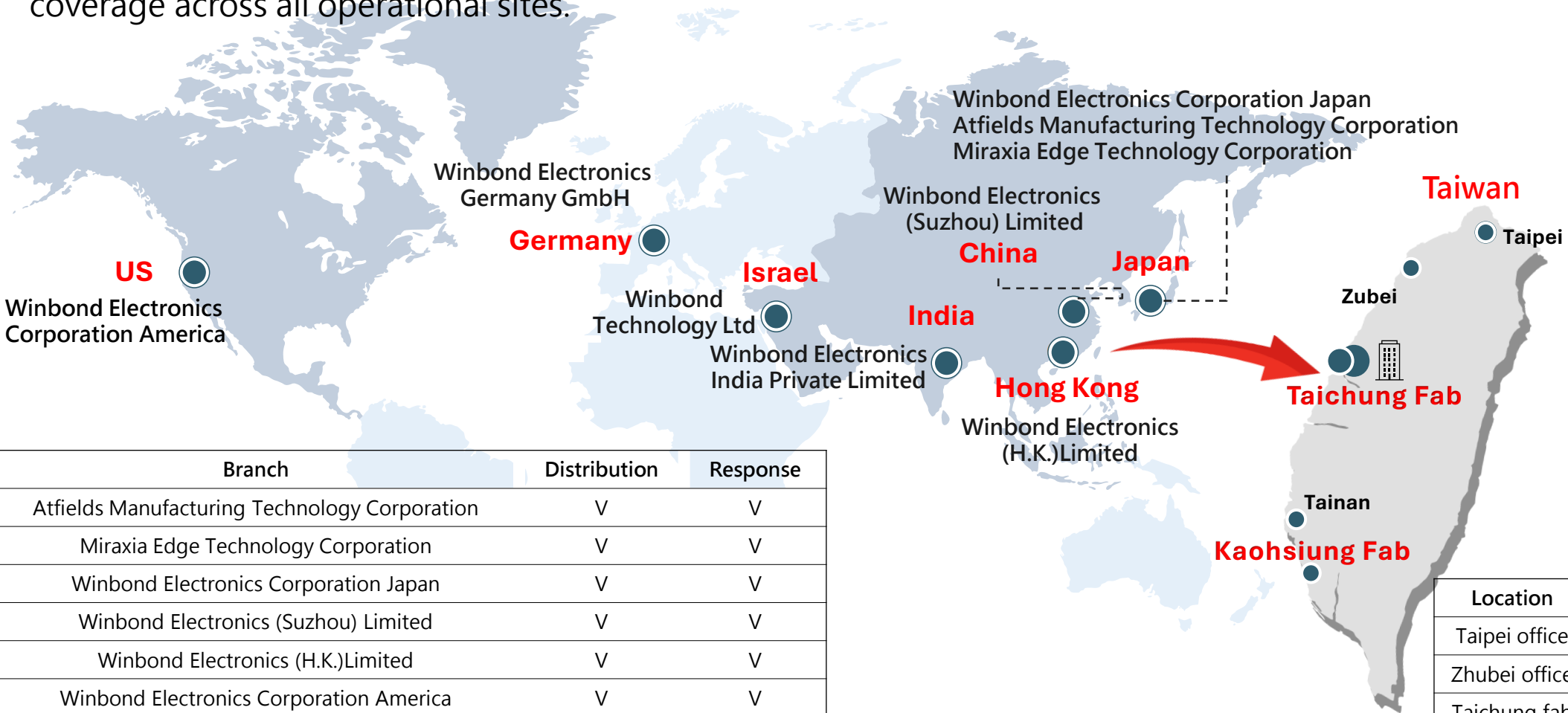
To ensure a rigorous assessment, Winbond mobilizes extensive cross-functional resources, including HR, EHS, and Fab operations to actively investigate current human rights risks and implement effective improvements.



*Note: Material data analysis and risk identification phases were successfully concluded in 2022.

Coverage Rate

Winbond's Human Rights Risk Assessment is distributed to all employees across our Taiwan Headquarters (Taipei, Chupei, Taichung, Tainan, Kaohsiung) and global subsidiaries (US, Japan, Israel, China, Hong Kong, Germany, India), achieving 100% coverage across all operational sites.



| Branch | Distribution | Response |
|---|--------------|----------|
| Atfields Manufacturing Technology Corporation | ✓ | ✓ |
| Miraxia Edge Technology Corporation | ✓ | ✓ |
| Winbond Electronics Corporation Japan | ✓ | ✓ |
| Winbond Electronics (Suzhou) Limited | ✓ | ✓ |
| Winbond Electronics (H.K.) Limited | ✓ | ✓ |
| Winbond Electronics Corporation America | ✓ | ✓ |
| Winbond Technology Ltd | ✓ | ✓ |
| Winbond Electronics India Private Limited | ✓ | ✓ |
| Winbond Electronics Germany GmbH | ✓ | ✓ |

| Location | Distribution | Response |
|---------------|--------------|----------|
| Taipei office | ✓ | ✓ |
| Zhubei office | ✓ | ✓ |
| Taichung fab | ✓ | ✓ |
| Tainan office | ✓ | ✓ |
| Kaohsiung fab | ✓ | ✓ 9 |

Summary of Human Rights Assessment

In the human rights risk identification process, a total of 37 human rights risk were identified. After assessing the available evidence, 9 issues were confirmed to have no potential violation. For the remaining 28 human rights issues in the categories of labor rights, health and safety, environment and community, and governance and ethics, a human rights risk assessment questionnaire was developed. The questionnaire evaluated the frequency and impact of each risk, and the risk score was calculated by multiplying the two factors. Based on the risk scores, a human rights risk matrix was created.



Human Rights Risks and Stakeholders (1/2)

| Category | No. | Topic | Stakeholders | | | | | | | | | | | | | | | |
|--------------|-----|--|--------------|-------|-----------|-----------|------------|-------------------|--------------------|--------|-------------------|-----------------------------------|--|--|--|--|--|--|
| | | | Employees | Women | Suppliers | Customers | Candidates | Children & Minors | Indigenous Peoples | Public | Local Communities | Miners in Conflict-Affected Areas | | | | | | |
| Labor Rights | 1 | Human Trafficking | ✓ | | ✓ | | | | | | | | | | | | | |
| | 2 | Forced or Compulsory Labor | ✓ | | ✓ | | | | | | | | | | | | | |
| | 3 | Talent Training and Development | ✓ | | ✓ | | | | | | | | | | | | | |
| | 4 | Working Hours | ✓ | | ✓ | | | | | | | | | | | | | |
| | 5 | Wages and Benefits | ✓ | | ✓ | | | | | | | | | | | | | |
| | 6 | Maternal Protection | ✓ | ✓ | ✓ | | | | | | | | | | | | | |
| | 7 | Diversity and Inclusion | ✓ | | ✓ | | | | | | | | | | | | | |
| | 8 | Freedom of Speech and Expression | ✓ | | ✓ | ✓ | | | | | ✓ | | | | | | | |
| | 9 | Physical and Mental Health | ✓ | | ✓ | | | | | | | | | | | | | |
| | 10 | Work-Life Balance | ✓ | | ✓ | | | | | | | | | | | | | |
| | 11 | Protection of Persons with Disabilities | ✓ | | ✓ | | | | | | | | | | | | | |
| | 12 | Freedom of Religion | ✓ | | ✓ | | | | | | | | | | | | | |
| | 13 | Gender Discrimination | ✓ | | ✓ | | | | ✓ | | | | | | | | | |
| | 14 | Employment and Occupational Discrimination | ✓ | | ✓ | | | | ✓ | | | | | | | | | |
| | 15 | Child Labor | | | ✓ | | | | | ✓ | | | | | | | | |
| | 16 | Freedom of Association | ✓ | | ✓ | | | | | | | | | | | | | |
| | 17 | Collective Bargaining | ✓ | | ✓ | | | | | | | | | | | | | |
| | 18 | Bullying and Harassment | ✓ | | ✓ | | | | | | | | | | | | | |

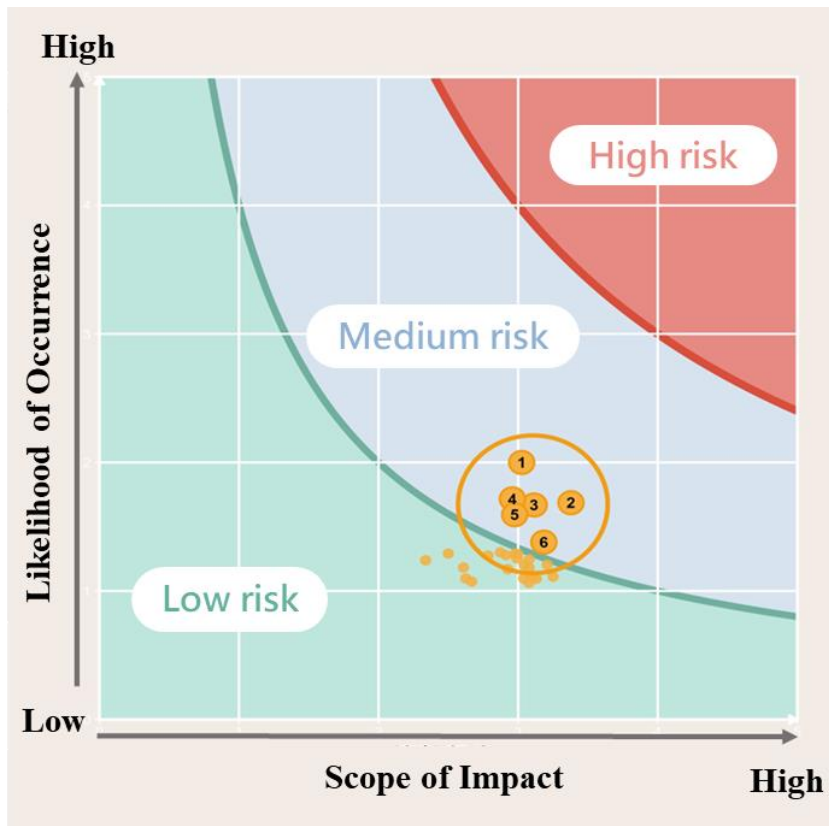
Human Rights Risks and Stakeholders (2/2)

| Category | No. | Topic | Stakeholders | | | | | | | | | |
|-----------------------------|-----|--|--------------|-------|-----------|-----------|------------|-------------------|--------------------|--------|-------------------|-----------------------------------|
| | | | Employees | Women | Suppliers | Customers | Candidates | Children & Minors | Indigenous Peoples | Public | Local Communities | Miners in Conflict-Affected Areas |
| Health & Safety | 19 | Occupational Injuries and Illnesses | ✓ | | ✓ | | | | | | | |
| | 20 | Public Health, Housing, and Dining | ✓ | | ✓ | | | | | | | |
| | 21 | Safety Operational Information | ✓ | | ✓ | | | | | | | |
| | 22 | Occupational Safety | ✓ | | ✓ | | | | | | | |
| Environment & Community | 23 | Biodiversity | | | | | | ✓ | ✓ | ✓ | | |
| | 24 | Material Control | ✓ | | | | | | | | | |
| | 25 | Local Community Rights | | | | | | ✓ | ✓ | ✓ | | |
| | 26 | Pollution Prevention and Resource Conservation | | | | | | ✓ | ✓ | ✓ | | |
| | 27 | Hazardous Substances | ✓ | | | | | ✓ | ✓ | ✓ | | |
| | 28 | Land Use and Property Rights | | | | | | ✓ | ✓ | ✓ | | |
| | 29 | Cultural, Spiritual, or Religious Impacts | | | | | | ✓ | ✓ | ✓ | | |
| Governance & Ethics | 30 | Harmful Products/Services | | | | ✓ | | | ✓ | | | |
| | 31 | Identity Protection and Non-Retaliation | ✓ | | ✓ | ✓ | | | ✓ | | | |
| | 32 | Personal Data and Privacy Protection | ✓ | | ✓ | | | | | | | |
| | 33 | Intellectual Property Rights | ✓ | | ✓ | | | | ✓ | | | |
| | 34 | Ethical Principles of Human Rights | ✓ | | ✓ | ✓ | | | ✓ | | | |
| | 35 | Fair Trade, Advertising, and Competition | | | | | | | ✓ | | | |
| | 36 | Responsible Sourcing of Minerals | | | ✓ | | | | ✓ | ✓ | ✓ | |
| | 37 | Product Testing | | | | | | | ✓ | | | |

Human Rights Risk Matrix

Winbond's Human Rights Risk Matrix classifies issues into High, Medium, and Low risk levels based on the product of impact severity and occurrence frequency.

The latest global survey results across 37 issues reveal zero high-risk issues requiring immediate mitigation. Six issues sit within the medium-risk monitoring zone: Working Hours, Forced Labor, Work-Life Balance, Talent Development, Bullying & Harassment, and Physical & Mental Health. The remaining 31 issues remain low-risk. This underscores a strong global consensus among employees that the likelihood and potential impact of human rights incidents at Winbond are extremely minimal.



Ranking of Key Human Rights Issues by Risk Score

- 1 Working hours
- 2 Forced or Involuntary labor
- 3 Work life balance
- 4 Talent training and Development
- 5 Bullying and Harassment
- 6 Physical and Mental health

Risk Mitigation and Remediation Measures(1/2)

With zero high-risk issues identified globally, Winbond has placed the six medium-risk issues under strict management. Continuous improvement actions are actively implemented to reduce risk occurrence and impact. The following matrix outlines the action plans executed across the Taiwan (Taipei Office, Jhubei Office, Central Taiwan Science Park Fab, Tainan Office, and Kaohsiung Fab) and each branch site, include US, Israel, Japan, China, Hong Kong, Germany, and India.

| Rank / Issue | Stakeholders | Risk Mitigation Measures | Risk Remediation Measures |
|-------------------------------|--------------|--|---|
| 1. Working Hours | Employees | <ul style="list-style-type: none"> Provide real-time online dashboards to help managers monitor and manage working hours effectively. Conduct ongoing training to strengthen managers' awareness of compliance and working hour risks. Optimize recruitment strategies to proactively bridge manpower gaps. | <ul style="list-style-type: none"> Investigate suspected cases thoroughly, enforce internal disciplinary actions, and restore all rightful entitlements to employees. |
| 2. Forced or Compulsory Labor | Employees | <ul style="list-style-type: none"> Deliver regular awareness campaigns and training on forced labor prevention to reinforce management vigilance. | <ul style="list-style-type: none"> Enforce maximum overtime caps and strictly monitor compensatory tracking (allowances/leave). Establish robust grievance channels and whistleblowing mechanisms for case-by-case resolution. Conduct strict internal investigations for suspected violations, ensuring swift disciplinary actions and the full restoration of employee rights. |
| 3. Work-Life Balance | Employees | <ul style="list-style-type: none"> Establish on-site recreation centers to encourage regular exercise and stress relief habits among employees. Host periodic health promotion and wellness lectures to enhance employees' self-care capabilities. | <ul style="list-style-type: none"> Optimize internal transfer policies and leverage targeted training to improve employees' understanding and utilization of internal mobility mechanisms. |

Risk Mitigation and Remediation Measures(2/2)

| Rank / Issue | Stakeholders | Risk Mitigation Measures | Risk Remediation Measures |
|------------------------------------|--------------|--|---|
| 4. Talent Training and Development | Employees | <ul style="list-style-type: none"> Systematically design diverse training programs aligned with corporate strategies and core culture to advance employee growth. Drive succession planning for management through job rotations and project assignments to secure key talent and boost organizational resilience. Announce internal rotation opportunities dynamically based on business needs, encouraging cross-functional learning and career flexibility. | <ul style="list-style-type: none"> Optimize internal transfer policies and leverage targeted training to improve employees' understanding and utilization of internal mobility mechanisms. |
| 5. Bullying and Harassment | Employees | <ul style="list-style-type: none"> Strictly enforce prevention management regulations against workplace unlawful infringements and sexual harassment. Conduct continuous anti-bullying management courses and update legal compliance standards to heighten risk awareness. Deliver clear anti-harassment messages regularly via corporate emails, bulletin boards, and posters to forbid any workplace misconduct. Maintain multi-channel, confidential grievance systems with comprehensive investigation and follow-up protocols to secure proper protection. | <ul style="list-style-type: none"> Provide full remedy channels alongside dedicated tracking and handling procedures for affected employees. Offer appropriate protection and reassignment support to victims who have encountered bullying or harassment. Conduct strict internal investigations for suspected violations, ensuring swift disciplinary actions and full accountability. |
| 6. Physical and Mental Health | Employees | <ul style="list-style-type: none"> Provide 24/7 healthcare services through an on-site nursing staff ratio that exceeds statutory requirements to assist with real-time wellness adjustments. Organize diverse health promotion activities regularly to deliver accurate medical insights and empower employees' self-care and improvement capabilities. Evaluate health risks via periodic check-ups while identifying workload risks to systematically remind, track, and assist in physical well-being. | <ul style="list-style-type: none"> Investigate suspected cases thoroughly, enforce internal disciplinary actions, and safeguard the full restoration of employee rights. |

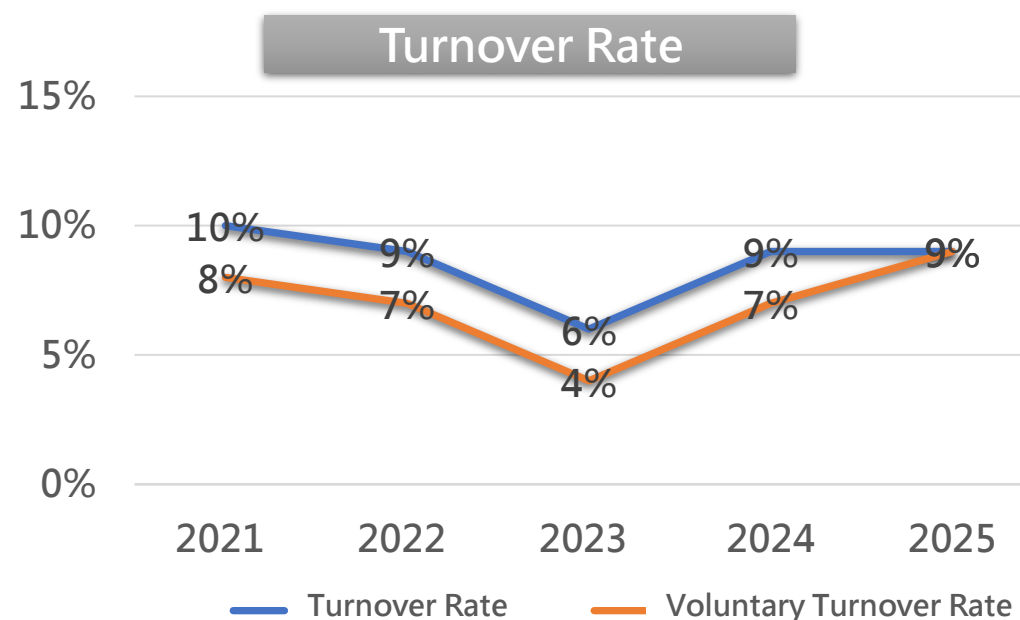
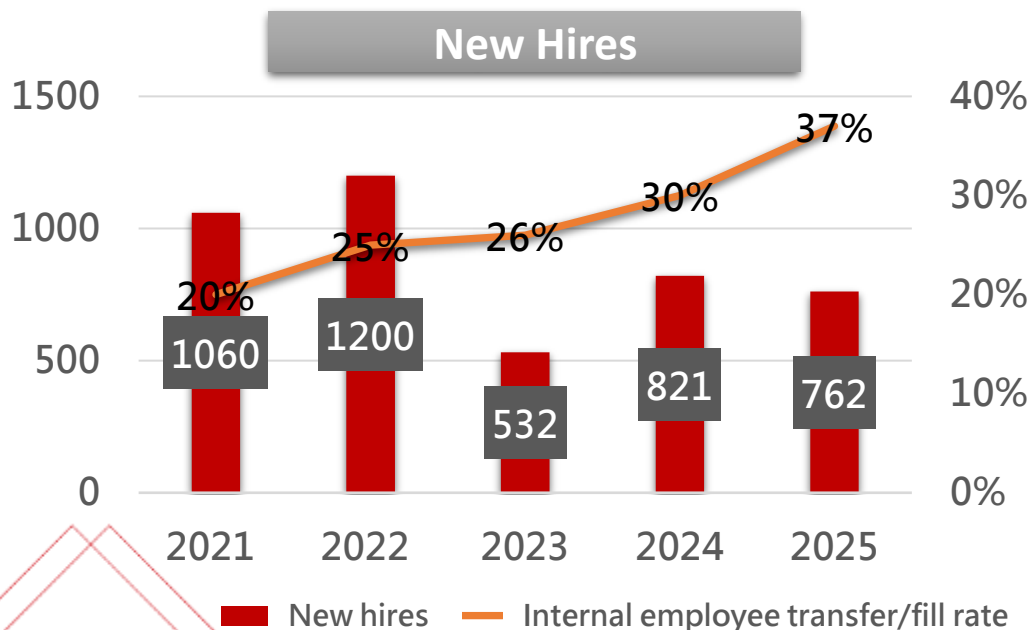
Recruitment and Retention

Winbond actively builds a diverse talent ecosystem, capturing outstanding professionals across various geographies, age groups, and backgrounds through campus recruitment, academy-industry collaborations, and social media. We drive a robust internal transfer system, encouraging cross-functional rotations to maximize employee potential.

Investing deeply in every career milestone, Winbond delivers long-term care through an all-encompassing support system. This framework offers diverse seminars and counseling services tailored for psychological adjustment and health promotion to elevate mental and physical resilience. For colleagues navigating career transitions, such as retirement or resignation, Winbond ensures seamless support by offering legal advance notice, job-seeking leave, and consultant re-employment opportunities, ensuring partners transition steadily into their next stage of life.

Winbond fosters a healthy talent mobility ecosystem through robust retention mechanisms. Our current retention performance in the Taiwan region surpasses the industry average in stability, with the newcomer turnover rate showing consistent year-over-year improvement—a testament to the success of our onboarding training and cultural integration initiatives.

In supporting career transitions, Winbond acts with extreme responsibility and care. Beyond delivering statutory advance notice, job-seeking leave, and consultant re-hiring for standard separations, we offer tailored career transition planning based on trust and transparent communication for involuntary departures. To mitigate any future large-scale workforce adjustments, Winbond has secured a comprehensive contingency framework, committing to trigger statutory procedures and consultations at least 60 days in advance to ensure the entire process remains transparent, objective, and fully protective of employee welfare.



Note: Winbond Group encompasses Winbond (Taiwan), Winbond's subsidiaries, Nuvoton (Taiwan), Nuvoton's subsidiaries, and Nuvoton's Japanese subsidiaries.

Diverse Talent Development

Winbond systematically delivers tailored talent development programs across organizational levels and professional competencies, perfectly aligned with our corporate vision, culture, and training needs surveys. Operating under a "Dual-Ladder" career development framework, our employees are empowered to choose between refining management capabilities or deep-diving into specialized technical domains based on their career aspirations. This robust investment yields tangible results: since 2023, full-time employees have averaged over 43 training hours annually (Note 1). By 2025, our average training expenditure per capita reached a high of NT\$8,600 (Note 2), reflecting Winbond's dedication to fueling continuous workforce advancement and building organizational resilience.

Winbond drives digital transformation through AI learning maps, certification systems, and data analytics tools. Concurrently, we cultivate a Diverse, Equitable, and Inclusive (DEI) workplace through language subsidies, training courses, and wellness seminars.



Note 1: Average annual training hours per employee from 2022 to 2025 were 37, 43, 43, and 49 hours, respectively.

Note 2: Average annual training investment per capita from 2022 to 2025 was NT\$5,866, NT\$5,108, NT\$5,700, and NT\$8,600, respectively.

Supplier Sustainability Due Diligence- Human Rights and Labor Protection

Winbond established Supplier Sustainability Due Diligence content based on RBA 8.0, ISO 20400:2017 Sustainable Procurement, and the OECD (Organization for Economic Co-operation and Development) Due Diligence Guidance for Responsible Business Conduct, with a specific focus on human rights management and risk assessment across the following dimensions:

Human Rights & Labor Protections

Human Rights Protection

Human Rights Risk Identification & Adaptation

Working & Labor Rights Protection

Occupational Health and Safety

Occupational Health & Safety

Health Management System

Supply Chain Human Rights Risk Management

1. Internal Capacity Building

By inviting benchmark suppliers to share practical experience in supply chain human rights management, helping employees deepen understanding of human rights risks, management mechanisms, and international trends as a foundation for advancing supplier human rights management.

2. Communication of Supplier Management Principles

Through regular promotion, Winbond communicated that suppliers should respect labor human rights and ensure dignified work conditions, including prohibiting forced labor, child labor, and discrimination; safeguarding reasonable working hours and wages and benefits; and respecting freedom of association and an inclusive workplace culture as fundamental principles for supplier management and cooperation.

3. Survey and Assessment

In Supplier Sustainability Due Diligence, Winbond assessed the human rights and labor protection and conducted preliminary human rights risk identification based on suppliers' industry characteristics, operating models, and responses, serving as the basis for follow-up management and coaching.

4. Results & Subsequent Response Plans

For suppliers identified with higher human rights risks, Winbond required the submission of corrective action plans (CAP) and verified tracking progress through subsequent follow-up and consultation mechanisms. When necessary, third-party professionals are deployed for on-site audits and worker interviews to ensure verified, effective implementation of improvement measures.

2025 Supplier Human Rights Due Diligence Results

In 2025, Winbond implemented due diligence across all Tier-1 suppliers. To strengthen implementation among Tier-1 significant suppliers with significant procurement spend and direct manufacturing relevance—the Sustainable Supply Chain Team conducted rigorous desk reviews for 133 suppliers. On average, OSAT suppliers, machinery and equipment suppliers, and raw material suppliers performed better. Results also showed strong performance in occupational safety and health and in human rights and labor protections.

Key Performance Metrics

- ✓ Percentage of suppliers assessed for human rights risks: **100%**
- ✓ Percentage of assessed suppliers with identified high-risk human rights issues: **8%**
- ✓ Percentage of high-risk suppliers with corrective actions and mitigation measures implemented: **100%**



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