

## **TCC Group Holdings**

### **Anti-Discrimination, Anti-Harassment, and Anti-Bullying Policy**

Established: July 2022

First revision effective as of May 27, 2024

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#### **I. Purpose**

TCC Group (hereinafter referred to as the “Group”), comprising TCC Group Holdings Co., Ltd. and its subsidiaries, is committed to creating a safe, diverse, equitable and inclusive workplace where all members can work in an environment of mutual respect, equality, and safety, free from any form of discrimination, harassment, or bullying.

The Group adopts a zero-tolerance policy and has established this “Anti-Discrimination, Anti-Harassment, and Anti-Bullying Policy” (hereinafter referred to as the “Policy”) in accordance with relevant international standards, global policies, and applicable local laws and regulations, including but not limited to the relevant conventions of the International Labour Organization (ILO), such as Convention No. 29 (Forced Labour), Convention No. 105 (Abolition of Forced Labour), Convention No. 111 (Discrimination in Employment and Occupation), and Convention No. 190 (Violence and Harassment in the World of Work).

This Policy is intended to protect all members of the Group—including but not limited to employees, dispatched workers, technical trainees, interns, and job applicants—from any form of improper conduct. The Group is committed to full compliance with all applicable laws, the implementation of necessary measures to safeguard individual rights, and the continuous promotion of awareness and practice of diversity, equity, inclusion, and cultural respect, thereby fostering a consistently respectful and inclusive work environment.

#### **II. Prohibited Conduct**

The Group maintains a zero-tolerance policy toward any form of discrimination, harassment, or bullying in the workplace. The following types of conduct are strictly prohibited:

##### **(I) No Tolerance for Discrimination**

Any form of discrimination based on personal traits—including but not limited to place of birth, ethnicity, skin color, age, sex, sexual orientation, gender identity or expression, race, social class, nationality, disability, medical history, pregnancy, language, ideology, religion, belief, political affiliation, political stance, group background, veteran status, union membership, protected genetic information, marital status, physical appearance, facial features, ancestral origin, astrological sign, or blood type—is strictly prohibited.

Such conduct includes, but is not limited to:

1. providing unequal treatment in recruitment, selection, training, benefits, or work-related matters.
2. refusing to offer benefits or engaging in other forms of unfair treatment.

3. using discriminatory or exclusionary language or behavior in the workplace.

## (II) No Tolerance for Harassment

Harassment refers to any unwelcome conduct that causes fear, humiliation, offense, or hostility, and includes but is not limited to the following:

### (1) Sexual Harassment

Sexual harassment refers to sexually suggestive or gender-discriminatory language or behavior—whether verbal, physical, or visual—occurring during the performance of duties or within the workplace, by any individual (including supervisors, colleagues, clients, etc.), that creates a hostile, coercive, or offensive work environment, infringes on dignity or personal freedom, or affects job performance.

It also includes making such conduct an explicit or implicit condition for employment, contract terms, assignments, remuneration, performance reviews, promotion, demotion, or disciplinary actions.

Examples include, but are not limited to:

1. inappropriate staring, touching, hugging, kissing, or sniffing any part of another person's body, or coercing others to do the same.
2. sending, displaying, or playing sexually suggestive or gender-discriminatory messages, images, sounds, videos, or materials.
3. repeated, unwanted following or pursuit.
4. demanding sexual acts through threats or punishment.
5. Sexual assault or coercive sexual conduct.
6. Insulting, demeaning, or discriminatory attitudes or behaviors based on gender.

### (2) Power-Based Sexual Harassment

Refers to individuals who exploit their position of authority—due to employment, training, education, healthcare, official duties, or other hierarchical relationships—to engage in sexually inappropriate behavior toward someone under their supervision, instruction, or care.

### (3) Stalking Harassment

Stalking harassment refers to repeated or ongoing behaviors—related to sex or gender—that violate the will of a specific individual, using people, vehicles, equipment, electronic communication, the internet, or other methods, thereby causing fear and disrupting daily life or social activity.

Such behavior includes:

1. monitoring, observing, or tracking the person's whereabouts.

2. loitering or following the person at their workplace or frequented locations.
3. threatening, mocking, insulting, discriminating against, or showing hatred toward the person in the workplace.
4. using phones, faxes, electronic communication, or internet tools to interfere with the person.
5. using work as a pretext to ask for dates, contact, or to pursue the person.
6. sending, displaying, or playing offensive messages, images, sounds, or materials.
7. disclosing or presenting damaging messages or items related to the person.
8. using personal data obtained through work without consent to order goods or services.

#### (4) Other Harassment

This includes harassment—verbal, physical, psychological, or economic—based on an individual’s place of birth, race, skin color, age, gender, sexual orientation, gender identity and expression, ethnicity, social class, nationality, disability, medical history, pregnancy, language, ideology, religion, belief, political affiliation, political stance, group background, veteran status, union membership, protected genetic information, marital status, appearance, facial features, or other personal characteristics, as well as any physical, mental, psychological, or economic harassment or any unlawful conduct involving control, coercion, violence, verbal abuse, mistreatment, or threats.

It also includes any explicit or implicit speech or behavior that insults or intimidates others, damages dignity, creates fear, hostility, or offense, or negatively affects someone’s ability to work, study, participate in activities, or conduct daily life.

#### (III) No Tolerance for Bullying

Bullying refers to any act of aggression—especially if repetitive, sustained, or severe—that occurs in the workplace and is committed by employers, supervisors, coworkers, clients, or third parties, targeting individuals or groups and threatening their physical or mental well-being, work performance, or workplace safety.

Examples include:

- (1) physical assault or injury.
- (2) verbal insults, defamation, or severe humiliation.
- (3) hostile exclusion or isolation.
- (4) workplace oppression, such as:
  1. assigning excessive or insufficient tasks in an unreasonable manner that causes stress or frustration.
  2. undermining one’s value or self-esteem through unfair task arrangements.

3. deliberately assigning unachievable tasks or targets to obstruct work.

(5) threats or intimidation.

(6) other intentional acts that harm personal dignity, health, or workplace safety.

#### (IV) Principles for Determination

(1) This Policy shall be implemented based on the principles of fairness and reasonableness. In order to maintain the normal operation of the enterprise or organization, the following actions do not constitute violations under this Policy:

1. reasonable work assignments:

work assigned or adjusted by the company or supervisors based on legitimate business needs, aiming to achieve work objectives and maintain quality.

2. work requirements based on company rules:

tasks required under internal work regulations, codes of conduct, internal control mechanisms, or performance management standards, aligned with corporate governance purposes.

3. reasonable expectations to improve performance or efficiency:

requirements intended to enhance team performance or improve individual work results.

4. lawful and compliant management actions:

measures implemented for management purposes that comply with local laws and the core principles of this Policy.

(2) Each case shall be evaluated based on its specific context. A comprehensive investigation must be conducted that considers the circumstances, work environment, relationship between involved parties, language or behavior of the alleged offender, and the perceptions of the affected party.

The determination shall take into account the facts, intent, and actual impact, ensuring that the outcome is fair, impartial, and consistent with the spirit of this Policy.

### **III. Management Mechanism**

#### (I) Raising awareness and Training

The Group regularly provides Policy-related education and training for all full-time employees to cultivate a workplace culture of respect and inclusion, and to ensure that all employees understand and comply with this Policy.

#### (II) Grievance Mechanisms

The Group offers multiple reporting channels to ensure that any member facing discrimination, harassment, or bullying receives timely support. Complainants or whistleblowers must identify

themselves and provide specific facts and supporting evidence through formal channels.

Unless otherwise required by law, both the Group and any persons assigned to investigate complaints shall maintain confidentiality to prevent retaliation or unfair treatment toward the complainant.

### (III) Grievance Review Committee

- (1) Each subsidiary of the Group shall establish a “Grievance Review Committee” (hereinafter referred to as the “Committee”) to handle cases related to discrimination, harassment, and bullying, and to conduct investigations and report cases in accordance with applicable laws. The Human Resources department shall serve as a standing member of the Committee. A specialized sub-committee shall be formed based on the nature of the case to ensure professionalism and impartiality throughout the investigation and resolution process.

#### (2) Types of specialized sub-committees include:

1. **Workplace Equality and Care Committee:** For cases requiring the composition of the Grievance Review Committee to meet legal requirements or government-issued guidelines.
2. **General Case Committee:** For all other types of grievance cases not falling under the above category.

### IV. Global Applicability Statement

This Policy serves as the Group’s global standard and applies to all operational sites. The Group shall make necessary adjustments in accordance with the legal requirements of each jurisdiction; however, the core principles of the Policy—namely zero tolerance, confidentiality, and protection against retaliation—shall apply to all regions and personnel.

Each subsidiary shall formulate specific implementation procedures based on this Policy and applicable local laws, and shall submit them to Group Headquarters for review and approval prior to enforcement.

### V. Implementation

This Policy shall take effect upon the approval of the Group Chairperson and resolution by the Company’s Board of Directors. The same procedures shall apply to any amendments.