



翔名供應商之責任與法令遵循義務
Supplier Responsibility on RBA

翔名之企業行為準則 Feedback Business Concept

本公司秉持以『**熱心、敬業、誠信、團隊、創新、合作**』的經營理念，『求精、求準、求穩』的品質目標，長期專注於本業之精進。

結合企業、員工與客戶之願景邁向專業卓越之高科技優質服務客戶為尊、待客以誠一直是翔名成立以來，堅持且奉行不渝的目標。在團結合作、新知研發、策略革新的腳步下不斷追求專業、快速及完整的服務，我們提供半導體、光電及真空產業更多更好的產品及解決方案，期許能在全球化競爭的趨勢下能為翔名的客戶增加競爭力。正如我們的英文名稱 Feedback 一樣，在成長與進步的同時，對產業、學界與社會的回饋，亦是我們的另一方向，我們衷心期望所有的夥伴可以一起成長，當然，也希望可以持續成為您永久的信賴的伙伴。

Feedback Technology adheres to the business philosophy of "**Enthusiasm, Dedication, Integrity, Teamwork, Innovation, and Collaboration**" and strives for long-term excellence in our core business. Combining the visions of the company, employees, and customers, we aim to achieve professional excellence in high-quality technology services, always prioritizing customer-centricity and conducting business with sincerity. This has been our unwavering goal since the establishment of Feedback Technology .

Under the principles of continuous research, development, and strategic innovation, we relentlessly pursue professionalism, and comprehensive services. We provide the semiconductor, optoelectronics, and vacuum industries with better products and solutions, aiming to enhance the competitiveness of Feedback's customers in the global market competition. Just as our English name "Feedback" suggests, while we grow and progress, giving back to the industry, academia, and society is another direction we are committed to. We sincerely hope that all our partners can grow together, and, of course, we aspire to continue being your trusted and enduring partner.

供應商之責任 Supplier's Responsibility

翔名對於自己與供應商在所有業務活動中均秉持著高標準的期待，為能有效確保供應鏈安全之管理要求，針對本公司配合之相關商業夥伴，特制定其遴選、查核及評鑑標準，以確保相關廠商之作業、活動或服務等皆能符合供應鏈安全之管理要求，以維護服務之品質與貨物之運輸、處理及存放安全，供應商亦須遵守負責任商業聯盟（RBA）關於勞工、健康、安全、環境、道德和管理體系之標準，故供應商應確保向我們提供的產品和服務符合所有的合約規範、法律和法規。

Feedback holds high expectations for itself and its suppliers in all business activities. In order to effectively ensure supply chain management requirements, we have established standard and criteria for supplier selection, audit, and evaluation. The criteria ensure that the operations, activities, and services of relevant suppliers meet the requirements of supply chain management, thereby maintaining the quality of services and the safety on transportation, handling, and storage of goods. Suppliers are also required to adhere to Responsible Business Alliance (RBA) standards regarding labor, health, safety, environment, ethics, and management systems. Therefore, suppliers must ensure that the products and services provided to us comply with all contractual specifications, laws, and regulations.

其規範包含 These specifications include:

- P-17-11C 保密協議 (NDA)
- P-17-07D 採購訂單及採購租賃合約安全衛生要求事項規範 (Purchase Agreement)
- P-17-12A 廉潔交易承諾書 (Integrity Commitment)
- REACH 符合性宣告 (REACH Compliance Declaration)
- 衝突礦產宣告 (Conflict Minerals Declaration)
- 遵守負責任商業聯盟（RBA）關於勞工、健康、安全、環境、道德和管理體系之標準。
Compliance with Responsible Business Alliance (RBA) standards on labor, health, safety, environment, ethics, and management systems.
- 完整資訊請參閱下方連結：For complete information, please refer to the following link:
- [Link to Responsible Business Alliance Code of Conduct](#)

供應商之責任 Supplier's Responsibility

根據翔名採購程序書P-18H

- 6.6.3 供應商交貨時，需附上相關要求之佐證證明，如保證書、符合法規要求之清單證明等，同時為確保供應商善盡社會責任、保護環境、重視勞動人權、安全、健康，交貨時之貨品來源不得使用來自衝突地區的衝突礦石，並依RBA精神要求並揭露相關產地資訊 (Au/Ta/Sn/W & Cobalt/Mica/Graphite)，以利驗收作業。

According to Feedback Procurement Procedures Manual P-18H, 6.6.3

- Suppliers are required to provide relevant supporting documentation as proof of compliance with specific requirements upon delivery. This documentation may include warranties, lists of compliance with regulatory requirements, and other necessary certificates. In order to ensure that suppliers fulfill their social responsibilities on RBA, it is mandatory that the products delivered by suppliers (Conflict minerals such as Au (Gold), Ta (Tantalum), Sn (Tin), W (Tungsten), Cobalt, and Graphite) do not originate from conflict regions. Suppliers are expected to adhere to the Responsible Business Alliance (RBA) principles and disclose relevant sourcing information for these materials to facilitate the inspection process upon delivery.

供應商之責任 Supplier's Responsibility

根據翔名商業夥伴管理程序書P-63D

5.8.3.1 商業夥伴資訊業者，提供資訊電子設備相關服務，並提供定期維修及故障排除之機動性，以維持公司服務運作穩定及資料傳輸保密性。

5.8.3.2 商業夥伴須使用隔離物區分原物料、成品及危險物品，說明如下：

5.8.3.2.1 危險物品處理：本公司貨件如屬危險物品皆按規定申報，並依國際危險品包裝管理規定進行各等級的包裝、危險標示，經海關核可、航空公司檢視貨品，合於規定才會接受委運。

5.8.3.2.2 海空運貨物，均需以適當的材質進行完整的包裝（紙箱、木箱、金屬箱）；如為多貨件進貨時需以膠膜束緊並固定，大盤裝貨須覆蓋透明膠布、繩網且將貨物固定。

5.8.3.3 商業夥伴平時須教育員工必要的安全觀念，以維護供應鏈上的任何環節之安全，並善盡商業夥伴之責任，所有貨物的裝卸、資料核對，都必須符合作業程序，以確保貨物之安全。

In accordance with Feedback's Procedures Manual P-63D, the following requirements apply to service providers with periodic maintenance and troubleshooting services :

5.8.3.1 Service Providers: Suppliers offering services related to electronic equipment must have the capability for maintenance and troubleshooting, to ensure the stability of the company's services and the confidentiality of data transmission.

5.8.3.2 Segregation of Materials: Business partners must segregate raw materials, finished products, and hazardous materials as follows:

5.8.3.2.1 Handling of Hazardous Materials: All hazardous materials belonging to the company must be declared as required and packaged according to international hazardous goods packaging management regulations. They must be appropriately labeled for hazards. Goods will be accepted for shipment only after customs approval and inspection by the airline, in compliance with regulations.

5.8.3.2.2 Packaging for Sea and Air Freight: Goods transported by sea or air must be securely packaged using appropriate materials such as paper boxes, wooden crates, or metal boxes. Multiple-item shipments must be securely wrapped with plastic film and secured. Palletized goods must be covered with transparent plastic wrap and secured with ropes or nets.

5.8.3.3 Safety Education: Suppliers are required to educate their employees on necessary safety, ensuring the loading of goods and data verification comply to the procedures.

廉潔交易

我們堅信以商業道德、產品品質以及對客戶的服務取得業務，從來不是透過賄賂或支付貪污費用，我們遵守，並期望我們的供應商遵守禁止賄賂的相關法律、條約，包含美國海外反貪腐法 (FCPA)、英國反賄賂法，因此翔名對於任何政治、商業上的賄賂採取零容忍政策！

故我們期待您：

- 縱使本地有支付疏通費(Facilitation Paymen)的行為或習慣，您的公司以及員工**不會支付**該等費用。
- 您的公司能理解並接受支付賄賂可能將導致商業上的遲延，或可能提升公司成本。例如：取得政府官方文件之遲延。
- 若您的公司員工面臨支付疏通費的要求，或覺得有被要求之可能，應立即向其上級報告。
- 員工**絕不收受不正當利益**或達成**不正當利益的分成**；絕不為謀取不正當利益而使交易對象接受或共同編造虛假議價資料、影響交易價格或交易之達成、進行違背職務之行為。前述「不正當利益」，指收受回扣、佣金、不當餽贈、非公司制式禮品、接受招待或其他類似行為。
- 對於賄賂與貪腐**零容忍政策**。
- 專屬聯絡方式來回報任何可能違反政策的行為。

法務專線：陳柳穗 03-5384900#1101

信箱：lisa.chen@feedback.com.tw

Ethical Practices

We firmly believe that our business success should be achieved through ethical business practices, product quality, and exceptional customer service. We expect our suppliers to comply with anti-corruption laws and treaties, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Feedback maintains a zero-tolerance policy towards any form of political or commercial bribery.

We expect:

- Even if there are local practices or customs involving facilitation payments, your company and employees **will not engage** in such payments.
- Your company understands and accepts that paying bribes may result in business delays or increased costs. For example, delays in obtaining government official documents.
- If your employees encounter requests for facilitation payments, they should immediately report this situation.
- Employees **will not accept or seek to share in improper benefits**. They will not engage in actions that involve providing false data, influencing transaction prices. "Improper benefits" include rebates, commissions, gifts, accepting hospitality, or any similar behaviors.

We maintain a strict **zero-tolerance policy** towards bribery and corruption and provide an exclusive contact for reporting any potential violations of this policy:

Legal Department: Lisa Chen at 03-5384900#1101

Email: lisa.chen@feedback.com.tw

This commitment to ethical business practices helps ensure transparency, trustworthiness, and integrity in all our business activities.

責任合作夥伴 (RBA) 行為準則

翔名科技公司致力於以毫不妥協的廉潔正直與專業精神開展業務。作為翔名的供應商您必須遵守這些準則以及您為商業行為所在國家適用的法律和法規。當這些準則所規範之標準與法律要求有歧異時，翔名期待您以較嚴格的標準以及法律，期望每個供應商皆能遵循這些法律與道德要求，並進行員工教訓訓練。

以下為規範之重點領域：

- 道德規範
- 勞工
- 環境
- 安全
- 管理體系

Feedback Technology is committed to conducting business with unwavering integrity and professionalism. As a supplier to Feedback, you are required to comply with these guidelines, as well as the laws and regulations applicable in your country of operation. In cases where these guidelines set stricter standards than legal requirements, we expect you to comply with the more stringent standards and the law. It is our expectation that every supplier follows these legal and ethical requirements and provides training to their employees in this regard.

The framework include the following areas:

- Ethic
- Labor
- Environment
- Safety
- Management Systems

完整資訊請參閱下方連結 For comprehensive information, please refer to the following link: [Link to Responsible Business Alliance Code of Conduct](#)

責任合作夥伴 (RBA) 行為準則

A. 勞工

- 1) 禁止強迫勞動
- 2) 年輕勞工
- 3) 工時
- 4) 工資與福利
- 5) 反歧視 / 反騷擾 / 人道待遇
- 6) 集結自由和集體談判

B. 健康與安全

- 1) 職業健康與安全
- 2) 應急準備
- 3) 工傷和職業病
- 4) 工業衛生
- 5) 體力勞動工作
- 6) 機器防護
- 7) 公共衛生和食宿
- 8) 健康與安全溝通

C. 環境

- 1) 環境許可和報告
- 2) 污染預防與資源保護
- 3) 有害物質
- 4) 固體廢物
- 5) 廢氣排放
- 6) 材料限制
- 7) 水資源管理
- 8) 能源消耗和溫室氣體排放

D. 道德規範

- 1) 誠信經營
- 2) 無不正當收益
- 3) 資料披露
- 4) 知識產權
- 5) 公平交易、廣告和競爭
- 6) 身份保護及防止報復
- 7) 負責任地採購礦物
- 8) 私隱

E. 管理體系

- 1) 公司承諾
- 2) 管理職責與責任
- 3) 法律和客戶要求
- 4) 風險評估和風險管理
- 5) 改進目標
- 6) 培訓
- 7) 溝通
- 8) 工人/利害關係人的參與和補救措施
- 9) 審核與評估
- 10) 糾正措施
- 11) 文檔和記錄
- 12) 供應商的責任

A. LABOR

- 1) Prohibition of Forced Labor
- 2) Young Workers
- 3) Working Hours
- 4) Wages and Benefits
- 5) Non-Discrimination/Non-Harassment/Humane Treatment
- 6) Freedom of Association and Collective Bargaining

B. HEALTH AND SAFETY

- 1) Occupational Health and Safety
- 2) Emergency Preparedness
- 3) Occupational Injury and Illness
- 4) Industrial Hygiene
- 5) Physically Demanding Work
- 6) Machine Safeguarding
- 7) Sanitation, Food, and Housing
- 8) Health and Safety Communication

C. ENVIRONMENT

- 1) Environmental Permits and Reporting
- 2) Pollution Prevention and Resource Conservation
- 3) Hazardous Substances
- 4) Solid Waste
- 5) Air Emissions
- 6) Materials Restrictions
- 7) Water Management
- 8) Energy Consumption and Greenhouse Gas Emissions

D. ETHICS

- 1) Business Integrity
- 2) No Improper Advantage
- 3) Disclosure of Information
- 4) Intellectual Property
- 5) Fair Business, Advertising and Competition
- 6) Protection of Identity and Non-Retaliation
- 7) Responsible Sourcing of Minerals
- 8) Privacy

E. MANAGEMENT SYSTEMS

- 1) Company Commitment
- 2) Management Accountability and Responsibility
- 3) Legal and Customer Requirements
- 4) Risk Assessment and Risk Management
- 5) Improvement Objectives
- 6) Training
- 7) Communication
- 8) Worker/Stakeholder Engagement and Access To Remedy
- 9) Audits and Assessments
- 10) Corrective Action Process
- 11) Documentation and Records
- 12) Supplier Responsibility

For comprehensive information, please refer to the following link: [Link to Responsible Business Alliance Code of Conduct](#)



多一份關注 少一份傷害

翔名攜手與您共創更美好的未來

Maintain a strong partnership built on trust, responsibility, and shared values.
Feedback appreciates your commitment to these principles as a valued supplier.

Appendix

廉潔交易之案例一

2018.11.27

讓鴻海多花7千萬元採購 前鴻海老臣廖萬城判刑前鴻海資深副總廖萬城被控向鴻海集團多家供應商索回扣，二審今天認定他違背總裁郭台銘裁示的採購原則，使鴻海多花7070萬多元採購，並收回扣，依刑法背信罪判1年4個月。

內鬼收廠商回扣1.6億 鴻海前副總廖萬城判刑2年定讞



鴻海老臣集體索回扣案，更一審去年11月依共同背信罪判前資深副總廖萬城2年徒刑，沒收犯罪所得316萬元，案經上訴，最高法院今駁回上訴定讞須入獄。(資料照)

廖萬城因擔任鴻海集團SMT（表面組裝技術）技術委員會副主委，握有採購鴻海集團所屬事業體零件、原物料和各式儀器的職權，被控違反相關採購決策及規範，圖謀一己私利，收受鴻海供應商回扣。

廉潔交易之案例二

2019.07.15

工程師6年貪2千萬 小三訊息成鐵證

新竹科學園區一名游姓採購工程師與黃姓同事一起收回扣A錢，6年來游男撈了將近2000萬，內心仍感到不平衡，認為黃男少給他50多萬，並傳LINE向小三徐姓女業務抱怨「我認真在工作，黃認真在A錢」。後來游男跟徐女鬧翻，徐女憤而揭發游男、黃男收賄事實，當初游男傳給她的抱怨訊息更成為訴訟鐵證，讓游男被判刑2年10月。

6年收賄2千萬 竹科工程師傳小三訊息成鐵證



翔名RBA教育訓練分享

翔名各單位皆派員參與RBA教育訓練，於課後完成相關測驗，並取得合格上課證明。



業務營運處協理



環安衛生管理處協理



人力資源經理



業務營運處經理



供應商管理部專員