Document name: Regulations Governing Sexual Harassment Prevention Measures, Complaints, and Disciplinary Actions

Prepared by: Human Resources Office

Prepared by: Chih-Hao Chen

Document level: ■ Public □ Internal use □ Internal only □ Confidential

Version Revision Record Table

Version	Revision date	Revised Content	Prepared by	Revised by	Comparison Table No.
1.0	2006/03/20	Regulation formulation	GTW-Human Resources	Chih-Hao Chen	
2.0	2022/03/11	Regulation revision	Human Resources Office	Chia-Ling Wu	
3.0	2024/03/22	Regulation revision	Human Resources Office	Yi-Fen Chan	
4.0	2025/05/27	Regulation revision	Human Resources Office	Yi-Fen Chan	

Table of Contents

I. [Purpose]: 4

II. [Applicable Scope]: 4

III. [Responsibilities]: 4

IV. [Terminology]: 4

V. [Content]: 5

VI. [Reference]: 13

VII. [Forms]: 13

VIII. [Attachment]: 13

I. **[Purpose]:**

To provide a workplace and service environment free from sexual harassment, and to adopt appropriate preventive, corrective, disciplinary, and handling measures to protect the rights and privacy of individuals, these regulations are established in accordance with Article 13, Paragraph 1 of the Gender Equality in Employment Act and the "Amendments to the Regulations for Establishing Measures on Prevention of Sexual Harassment in the Workplace" issued by the Ministry of Labor.

II. **[Applicable Scope]:**

These policies apply to all Company personnel (including full-time, contract, and dispatched employees), as well as vendors and job applicants with whom they have business dealings.

III. **[Responsibilities]:**

(I) Managed by: Human Resources Office

(II) Formulation of procedures: These Regulations are formulated (amended) by the Human Resources Office, in consultation with the Group Headquarters Audit Office and the Group Headquarters Administrative Services Department, and shall be announced and implemented upon approval by the Group CEO.

IV. **[Terminology]:**

Sexual harassment as defined in this policy refers to the definition in Article 12 of the Gender Equality in Employment Act, which states that any person (including supervisors, employees, clients, etc.) makes sexual requests, or engages in sexually suggestive or gender-discriminatory verbal or behavioral actions that create a hostile, coercive, or offensive work environment, infringing upon or interfering with the personal dignity, personal freedom, or affecting the work performance of personnel to whom this policy applies; or where a supervisor makes explicit or implicit sexual demands, or engages in sexually suggestive or gender-discriminatory statements or conduct toward persons subject to these Regulations, and uses such demands, statements, or conduct as a quid pro quo for the establishment, continuation, modification, assignment, allocation, compensation, performance appraisal, promotion, demotion or transfer, or rewards and disciplinary measures under an employment contract. Specifically, examples of sexual harassment include the following:

(I) Insulting, contemptuous, or discriminatory attitudes and behaviors arising from gender differences.

(II) Inappropriate staring, touching, hugging, kissing, or smelling any part of another person's body; forcibly causing another person to do the same to any part of one's own body.

(III) Sending, leaving, displaying, or broadcasting sexually suggestive or discriminatory texts, images, sounds, videos, or other items.

(IV) Repeated or persistent acts of following or pursuing a person against their will.

V. **[Content]:**

(I) To prevent sexual harassment in the workplace, protect employees from the threat of sexual harassment, create a positive work environment, and enhance gender equality awareness among supervisors and employees, the Company has established a review and improvement mechanism for preventive measures and provides necessary protective measures. These measures include promoting awareness of sexual harassment prevention and grievance procedures, implementing education and training on preventing sexual harassment in the workplace, and publicly disclosing relevant information in prominent areas of the workplace.

(II) The Company shall properly utilize various opportunities and methods for conveying information, such as meetings, announcements, emails, or internal documents, to strengthen communication of sexual harassment prevention measures and grievance channels to its employees. The Company shall implement sexual harassment prevention education and training for the following personnel:

1. Employees should receive education and training on sexual harassment prevention in the workplace.
2. Supervisors and personnel involved in handling, investigating, and resolving sexual harassment grievances must undergo relevant annual education and training.
   The education and training referred to in the preceding paragraph shall be prioritized for personnel or members of the units designated in the preceding article, the Company's directors (or council members), supervisors (or board supervisors), managers, and those holding supervisory positions.

(III) When the Company becomes aware of sexual assault or sexual harassment, it shall take immediate and effective corrective and remedial actions, paying attention to the following matters:

1. Where an incident of sexual harassment is brought to the Company’s attention through a grievance filed by an affected party:
   (1) Implement appropriate protective separation measures, taking into account the complainant’s express wishes, to prevent further occurrences of sexual harassment, while ensuring that no adverse modifications are made to the complainant’s compensation, working conditions, or employment terms.
   (2) Provide direct support or refer the complainant to professional counseling, medical and psychological consultations, social welfare resources, and other essential care services.
   (3) Initiate a formal investigation procedure, conduct thorough interviews with relevant parties involved in the sexual harassment incident, and execute appropriate investigative protocols.
   (4) Where the respondent is in a position of authority and the circumstances are serious, and the suspension or adjustment of the respondent's duties is deemed necessary during the investigation, the Company may temporarily suspend or modify the respondent's duties. If the investigation determines that the conduct does not constitute sexual harassment, any salary withheld during the period of suspension shall be retroactively paid to the respondent.

(5) If the investigation determines that the conduct constitutes sexual harassment, appropriate disciplinary or corrective action will be taken against the perpetrator based on the severity of the offense. In cases of severe misconduct, the Company may terminate the employment contract without prior notice, as stipulated in Article 13-1, Paragraph 2 of the Gender Equality in Employment Act.

(6) If it is substantiated that the facts of the grievance have been maliciously fabricated, appropriate disciplinary action or other measures shall be taken against the complainant.

2. If a sexual harassment incident comes to the Company's knowledge other than under the circumstances mentioned above:

(1) Interview relevant parties to clarify and verify relevant facts.

(2) Inform the affected party of their rights and available remedies, and assist them in filing a grievance upon their request.

(3) Appropriately adjust work content or work locations for relevant personnel.

(4) Provide support to the affected party or refer them to counseling, medical or psychological support, social welfare resources, and other necessary services upon their request.

If the Company becomes aware of a sexual harassment incident through an affected party's report, but the affected party does not wish to file a formal grievance, the Company shall nevertheless take immediate and effective corrective and remedial measures in accordance with Subparagraph 2 of the preceding paragraph.

At the request of the complainant or affected party, the Company will provide at least two sessions of psychological counseling assistance.

(IV) If the respondent to the sexual harassment grievance is not a Company employee, or the complainant is a temporary worker or job applicant, the Company will still handle the grievance in accordance with the relevant provisions of these Regulations and take the immediate and effective corrective and remedial measures specified in the preceding paragraph. In cases where the affected party and the alleged perpetrator belong to different business entities but maintain a joint operation or commercial relationship, the Company shall immediately and effectively execute the corrective and remedial measures specified in the preceding paragraph upon becoming aware of the sexual harassment incident.

1. Notify the other employer in writing, by fax, orally, or through other electronic means to discuss solutions or remedies.
2. Protect the privacy and other personality rights of the parties involved.

(V) When employees perform duties in work environments beyond the Company's direct control or management, the Company shall identify the types of workplace sexual harassment risks, establish necessary protective measures, and provide detailed advance notification of these protocols to the affected employees.

When the Company becomes aware of sexual harassment incidents between employees that fall within the scope of the Sexual Harassment Prevention Act or the Stalking and Harassment Prevention Act, it will monitor workplace sexual harassment risks and provide timely prevention and relevant assistance measures.

(VI) Sexual harassment grievance, investigation, and handling procedures

The Company will handle sexual harassment grievances and resolutions confidentially to protect the privacy and personal rights of both parties involved and ensure that the complainant is free from any retaliation or adverse treatment.

1. Established the Sexual Harassment Grievance Center
   (1) Grievance mailbox: 995@gamania.com
   (2) The grievance mailbox serves as the official direct channel for submitting reports of sexual harassment incidents. The Group's Human Resources Office receives these reports and forwards them to the Grievance Handling Committee for handling.
   (3) The Committee is jointly composed of employer and employee representatives and is responsible for handling workplace sexual harassment grievances.
   The Grievance Handling Committee shall comprise three to seven members, headed by a Chairperson who serves as the presiding officer of all meetings. In the Chairperson's absence or inability to preside, a designated member shall act on their behalf. The Committee may retain external experts and scholars as necessary, provided that female representation constitutes at least half of the total membership. In the event of a sexual harassment incident occurring during the performance of duties involving dispatched personnel, the Company shall accept grievances, conduct a joint investigation in coordination with the dispatching agency, and notify both the dispatching agency and the affected parties of the investigation outcomes.
   (4) Individuals involved in handling, investigating, and resolving sexual harassment grievances must recuse themselves if they are the complainant, the respondent, or are related to either the complainant or respondent as a spouse, former spouse, blood relative within the fourth degree of kinship, relative by marriage within the third degree of kinship, or parent or household member. If personnel mentioned in the preceding paragraph do not recuse themselves, or if concrete facts exist suggesting a bias in their duties regarding the same grievance, the complainant or respondent may submit a written request to the Company, stating the reasons and

facts, and requesting recusal. Personnel requested to recuse themselves may submit a written response to the request. Any personnel subject to a recusal request shall cease handling, investigating, or making decisions on the matter pending the Company's determination to approve or reject the recusal request. However, necessary measures may still be taken in urgent situations. Where a party subject to mandatory recusal fails to recuse themselves, and no recusal request is made by either the complainant or respondent, the Company shall order such person to recuse themselves.

2. Recognizing that workplace sexual harassment can severely compromise physical and mental well-being, the primary purpose of establishing grievance procedures is to offer a confidential, secure reporting channel. The intake office and members of the investigation committee shall maintain strict objectivity, utilizing prompt mediation and dispute resolution mechanisms to provide appropriate redress for affected parties.
3. Sexual harassment grievance procedures
   (1) Filing a grievance
      A. When an employee feels that either a “hostile, coercive, or offensive” environment exists, or that they have experienced “quid pro quo sexual harassment,” it constitutes the basis for filing a grievance.
      B. The complainant may send an email to 995@gamania.com describing the incident, or may file a grievance verbally or in writing. For verbal grievances, the intake personnel or unit should make a record, read it aloud to the complainant or allow them to review it, confirm its correctness, and obtain their signature or seal. The following details should be included:
         a) Name, service unit, title, residential address, contact number, and grievance date of the complainant.
         b) If a legal representative or appointed agent exists, a letter of authorization must be attached, specifying the agent’s name, residential address, and contact number. The appointer must also attach a letter of authorization.
         c) Facts and content of the grievance, and supporting evidence.

         Where a written grievance or record of an oral grievance fails to comply with the format prescribed in the preceding paragraph, but the deficiency is remediable, the Company shall notify the complainant to rectify the deficiency within 14 days. If no remediation is made within the time limit, the grievance will not be accepted.
      C. The complainant should prepare or continue to gather specific facts or evidence related to the harassment case and provide them to the investigation

team to facilitate investigation. The burden of proof shall be as follows:

a) Detailed records of the people, events, time, place, and objects involved in the incident.

b) Relevant evidence (witness statements, testimony, physical evidence, audio recordings, etc.).

c) Your feelings or expression of your intention to stop or prevent the sexual harassment.

D. Before the workplace sexual harassment Grievance Handling Committee reaches a resolution, the complainant or their authorized representative may withdraw their grievance in writing. Once withdrawn, the grievance cannot be resubmitted for the same matter. However, if the complainant withdraws the grievance, they may still file a new grievance if new facts or evidence emerge regarding the same matter.

E. The resolution of the Grievance Handling Committee shall be notified in writing to the complainant, the respondent, and the Company, indicating that any party disagreeing with the resolution may submit a reconsideration request to the Grievance Handling Committee within 20 days of receiving the resolution.

(2) Principles of investigation

A. Sexual harassment investigations should be conducted confidentially, protecting the privacy and personal rights of those involved. Names or other identifying information should be kept confidential unless necessary for the investigation or based on public safety considerations. Evidence related to workplace sexual harassment incidents must not be falsified, altered, destroyed, or concealed.

B. Sexual harassment investigations should be conducted objectively, impartially, and professionally, providing all parties involved with ample opportunity to present their views and defenses.

C. Where the affected party's statement is sufficiently clear and further questioning is deemed unnecessary, repeated questioning shall be avoided.

D. During the investigation of sexual harassment incidents, the parties involved and related individuals may be asked to provide statements, and relevant experts may be invited to provide assistance.

E. Where a power imbalance exists between the parties or witnesses involved in a sexual harassment incident, they shall not be required to confront one another.

F. Where necessary to advance the investigation, and subject to strict compliance with confidentiality obligations, the investigator may prepare supplementary written materials for review by the parties or brief them on key procedural points.

G. All personnel involved in the handling of sexual harassment incidents shall maintain strict confidentiality regarding the names and identifying information of all involved parties, except where disclosure is necessary for investigative purposes or public safety considerations.

H. Individuals who file a complaint, accusation, or report; initiate legal proceedings; provide testimony or assistance; or otherwise participate in the complaint, investigation, inquiry, or adjudication procedures of a sexual harassment case shall not be subjected to any improper discriminatory or differential treatment.

4. Grievance Handling Timeline and Committee Member Attendance Regulations

The workplace sexual harassment Grievance Handling Committee shall conclude the case within two months of the grievance filing date. If necessary, this deadline may be extended by one month by notifying all parties involved. The investigation findings shall be recorded in a reasoned decision and may include recommendations for disciplinary action or other appropriate measures. The Grievance Handling Committee may convene a meeting only with the attendance of more than half of its members, and resolutions may be adopted only with the consent of more than half of those present. In the event of a tie, the chairperson shall make the final decision.

If the complainant considers that the Company has failed to address the matter or disagrees with the findings of the Company's investigation or disciplinary decision, the complainant may file a complaint with the local competent authority pursuant to Article 32-1 of the Gender Equality in Employment Act.

If the complainant believes the Company failed to take immediate and effective corrective and remedial measures upon becoming aware of sexual harassment, they may file a grievance with the local competent authority pursuant to Article 34, Paragraph 1 of the Gender Equality in Employment Act.

5. Reconsideration Regulations

If a party objects to the resolution, they may apply for a reconsideration to the Grievance Handling Committee within 20 days from the day following the date of service of the resolution. However, where the grounds for reconsideration arise or are discovered subsequently, the period shall commence from the date on which the party becomes aware of such grounds. The reconsideration application must be submitted with written

justification and will be reviewed and decided upon by the Grievance Handling Committee in a separate meeting. After the case is closed, no further grievances may be filed on the same matter. A party may file a request for reconsideration against a resolution of the workplace sexual harassment Grievance Handling Committee under any of the following circumstances:

(1) The resolution of the grievance and the reasons stated therein are contradictory.
(2) The Grievance Handling Committee was not lawfully constituted.
(3) A committee member subject to recusal under Article 15 of the Regulations for Establishing Measures on Prevention of Sexual Harassment in the Workplace participated in the decision.
(4) A committee member who participated in the resolution was convicted by a final judgment of a criminal offense committed in breach of their duties concerning the grievance.
(5) A witness or expert appraiser provided false or misleading testimony or evaluations that formed the basis of the resolution.
(6) The evidence serving as the basis for the decision was forged or falsified.
(7) The civil, criminal, or administrative court judgment or administrative disposition serving as the basis for the decision was subsequently changed by a final and binding judicial ruling or administrative disposition.
(8) Discovery of evidence that was not duly considered or evidence admissible for use.
(9) Failure to consider important evidence material to the resolution.

6. For sexual harassment grievances that have entered the judicial process, the grievance handling unit may decide to suspend the investigation and resolution with the complainant's consent. This suspension period will not count toward the restriction stating that "workplace sexual harassment Grievance Handling Committee's two-month deadline for case closure, which may be extended by one month if necessary, and all parties will be notified."

7. Rulings and Disciplinary Actions:
Upon confirmation of a sexual harassment incident following investigation, the Company may, depending on the severity of the offense, subject the respondent to transfer, demotion, compensation reduction, disciplinary action, or other measures as stipulated in the Work Rules and applicable regulations. Notify the competent local authority in accordance with the requirements and procedures stipulated by the Ministry of Labor. If criminal liability is involved, the Company shall assist the complainant in filing a grievance. When the Company is jointly liable for damages under Article 27, Paragraphs 1 and 2 of the Gender Equality in Employment Act, it has the right to seek recourse from

the perpetrator after compensating the affected party.

The basic principles of rulings and disciplinary actions are as follows:

(1) Unwelcome sexual remarks or physical contact → Verbal warning, formal reprimand, minor or major disciplinary action, transfer, or dismissal.

(2) Using sexual acts or other sexual conduct as a condition for employment-related benefits or decisions → Dismissal.

(3) Using threats or punitive measures to demand sexual acts or other sexual conduct → Dismissal.

(4) Acts of indecency or sexual assault → Dismissal.

(5) Insulting, degrading, or discriminatory attitudes or conduct arising from gender differences → Verbal warning, formal reprimand, minor or major disciplinary action.

(6) Other harassment behaviors not classified above will be subject to disciplinary action based on the severity of the situation, including verbal warnings, formal reprimands, minor or major disciplinary actions, transfers, demotions, and dismissals.

(7) The penalty will be increased if a direct supervisor commits the above-mentioned acts.

(VII) The Company shall monitor, evaluate, and supervise the implementation of resolutions rendered by the workplace sexual harassment Grievance Handling Committee to ensure that disciplinary and corrective measures are effectively implemented while preventing recurrence or retaliation.

(VIII) Where an affected individual requires counseling, medical, or legal assistance, the Company may proactively arrange referrals to appropriate professional counseling services, medical institutions, or legal assistance resources, or provide assistance in accessing such services.

(IX) The Company will not dismiss, transfer, or take any other adverse action against employees who file grievances or assist others in filing them.

(X) If the perpetrator of sexual harassment is not a Company employee, the Company shall provide appropriate protection as outlined in these regulations.

(XI) Where the respondent to a sexual harassment grievance is the highest responsible person of the Company, employees or job applicants may utilize the Company's internal reporting channels or file a grievance directly with the local competent authority pursuant to Article 32-1, Paragraph 1, Subparagraph 1 of the Gender Equality in Employment Act.

(XII) Matters not specified herein shall be handled in accordance with the Gender Equality in Employment Act. If any provision conflicts with the Act, it shall be deemed invalid.

VI. **[Reference]:**

(I) Gender Equality in Employment Act.

(II) Department of Labor, Taipei City Government Template for "Workplace" Sexual Harassment Prevention Measures, Grievance Procedures, and Disciplinary Measures.

VII. **[Forms]:** None.

VIII. **[Attachment]:** None.