

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT



Imperial Pacific International Holdings Limited

MESSAGE FROM THE BOARD OF DIRECTORS



At Imperial Pacific, creating shared value with our stakeholders is the basic principle of our business. Our vision motivates us on how we interact with our people, guests and communities, and drives us in making a difference in the world.

This is a year with unprecedented challenges, while Imperial Pacific remains focused on developing the Group's Imperial Pacific Resort Hotel • Saipan (the "**Resort**") on Saipan, we have endeavoured to conduct our business sustainably, both in our everyday operations and our value chain. We have put extra effort into working with our stakeholders to address any risks or issues that are important in our sustainable development.

While we are dedicated to being a leader in the entertainment and leisure industry, we strive to strike a balance between the economic development of the Northern Mariana Islands and the development of local communities. Our local Corporate Social Responsibility Team empowers the community by providing the locals with better living environment, education and employment.

MESSAGE FROM THE BOARD OF DIRECTORS

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To manage our environmental impact, our group-wide environmental policy provides governance on how we implement environmental considerations in our daily operations. We also monitor our environmental performance regularly. In the construction of the Resort, we have been working with the government and contractors closely to minimise environmental risks. During the year, we have spent resources on a new drainage system to improve existing water channels and to prevent flooding risks.

As transparency and accountability are the foundations of our sustainability approach, we have engaged with stakeholders throughout the year in understanding their views. Their comments and expectations are acknowledged and presented in this Environmental, Social and Governance ("ESG") Report.

We foresee opportunities and challenges ahead, however we remain dedicated to our sustainability commitments. We look forward to 2018 and hope our stakeholders will accompany us on this exciting journey.

For and on behalf of the Board Imperial Pacific International Holdings Limited Cai Lingli Executive Director



THE REPORTING APPROACH



Imperial Pacific International Holdings Limited (the "Group" or "Imperial Pacific") is pleased to publish our second Environmental, Social and Governance Report (the "Report"). The Report is prepared in accordance with the Environmental, Social and Governance Reporting Guide ("ESG Guide") set out in Appendix 27 of the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong.

The scope of the Report covers Imperial Pacific's operation in Hong Kong, Macau and the Commonwealth of the Northern Mariana Islands ("**CNMI**"). Unless otherwise specified, the reporting period of this Report is from 1 January 2017 to 31 December 2017.

CORPORATE GOVERNANCE

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The Group believes that high corporate governance standards are crucial for the prosperity of the business. Our board of directors (the "**Board**" or the "**Directors**") acts as the overall supervisory and monitoring body that ensures the effectiveness of our corporate governance system and seeks to maximise the interests of all our stakeholders.

We are committed to complying with laws and regulations in the jurisdictions where we operate, and strive to go beyond compliance standards.

For more information regarding our corporate governance, please refer to the "Corporate Governance Report" in our 2017 Annual Report.



ESG RISK MANAGEMENT AND GOVERNANCE

Sustainability issues are regularly reviewed at all levels of the Group. Our board of directors, the highest governing body of the Group, is responsible for reviewing our sustainability focus areas and their impact on business success. It also provides strategic directions to formulate relevant strategies and initiatives. Our management, in response to the Board's advice, is responsible for monitoring the effectiveness of existing strategies and initiatives, and for seeking continuous improvement on a yearly basis. Our Legal and Compliance team and representatives in each department are responsible for driving sustainability initiatives throughout the Group.



STAKEHOLDER ENGAGEMENT

Imperial Pacific International Holdings Limited ESG Report 2017

Sustainability goals can only be achieved through stakeholder collaboration, hence we engage with our employees, investors, business partners, the Government and the community. Our stakeholders not only serve as our driving force in pursuing better sustainability, but also motivate our collaboration partners in developing better businesses that are beneficial for society as a whole. We are keen to translate their expectations into our business values. Every year, we go through a stringent stakeholder engagement process to understand the importance of each ESG issue to the Group. The results of stakeholder engagement served as the basis of this Report.

Based on the stakeholder engagement exercise, we found that stakeholders considered the following issues important.



OUR PEOPLE

Our talented and professional employees play a crucial role in the future sustainability of our business. To be the best employer of choice, we are steadfast to fulfilling human rights, providing career development opportunities and a healthy and safe workplace.

Our Employment Policies and Procedures underpin our commitment to human rights, supporting labour practices including diversity and inclusion, equal employment opportunities, continuous training and development, anti-discrimination and health and safety.

Total workforce by geographic location as at 31 December 2017:

Hong Kong and Macau	150
Saipan	1,606
Total workforce	1,756

OUR PEOPLE

Imperial Pacific International Holdings Limited ESG Report 2017

Embracing Diversity and Inclusion

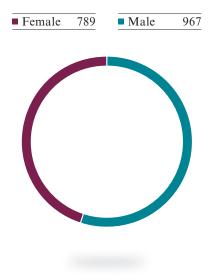
Our vision is to become a strong and prosperous Group which is achieved by creating a fair and inclusive workplace. We promote equal opportunity across our operations and seek to maintain a work environment that is free from discrimination. No employee of the Group shall be discriminated on the basis of race, national origin, disability, color, gender, religious belief, age, sexual orientation, marital status and other status protected by law. Our equality and diversity policy ensures that all employees and job applicants are offered equal opportunities for recruitment, remuneration, access to benefits, training and promotion.

Orientation training on regulations on equal opportunity are provided to all new joiners to the Group. To emphasize the importance of antidiscrimination at every level of our Group, our managers are sent to participate in overseas seminars organized by the United States Equal Employment Opportunity Commission (EEOC) to ensure that we are always up to date on any changes to EEOC regulations. In the unfortunate case in which an employee feels that he/she has been treated unfairly, he/ she is encouraged to contact the equal opportunity officer from our Human Resources Department. All reported cases will be examined thoroughly in a confidential and timely manner. If discrimination is confirmed, the Group will issue a written warning to the relevant parties. In the unlikely event if serious misconduct is identified, the case will be referred to law enforcement authorities. We comply with all applicable EEOC regulations, and prohibit any unlawful discrimination.

We also prohibit the use of child and forced labour and comply with all applicable laws and regulations in the jurisdictions where we operate.

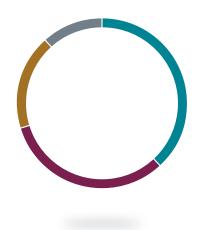
To further support the local economy and nurture local talents, priority is given to local hiring, while keeping an open mind on hiring foreign talents for their specific skills. We held 23 recruitment events this year, in Saipan and Guam, and in the United States. To help retain the best local talents in the market, our internship programs continued in Saipan this year.

Gender Diversity



Age Diversity

■ ≤30	671	41-50	320
31-40	564	■≥50	201



OUR PEOPLE

Nurturing Talents

We have created a motivating and aspiring working environment to bring out the best in our people and to inspire our business to even greater success. Training and mentoring opportunities are tailored to provide employees with specific skills for the gaming and leisure business.

In 2017, we launched 557 training classes and provided a total of 1,472 training hours. In order to deliver exceptional services and create memorable experiences for our customers, we ensure that all employees are equipped with the relevant experiences and skills to provide excellent services and in anticipating customer needs. Our hotels appoint training managers to assist frontline employees develop their hospitality skills and attributes through training sessions. Knowledge-based training on food and beverage is conducted to educate food handling staff on the requirements and standards on food processing in Imperial Pacific and to build their awareness on hygiene issues. We also require our staff to be able to provide basic emergency medical assistance in case of urgent circumstances, hence our staff are given hands-on training and lectures from the American Red Cross First Aid. A majority of our staff are given Mandarin language courses to better serve our growing number of Mandarin-speaking customers.

Internally, we reinforced our commitment to professional business practices and professional service by embedding new technology into training courses whilst external training is also greatly encouraged. We assist our employees in every way possible to explore and reach their full potential and increase our leadership capacity across the business.

OUR PEOPLE

Imperial Pacific International Holdings Limited ESG Report 2017

Ensuring Health and Safety in Workplace

It is our responsibility to provide a healthy and safe workplace for our operating staff, hence we provide health checks, training and monthly newsletters with health and safety information.

Sub-contractors play a vital role in our construction projects. We have introduced strict requirements for them to comply with all laws and regulations. Regrettably, we had one fatal accident this year in which an employee from a sub-contractor fell from a scaffolding. After such accident, a comprehensive overhaul was carried out and all safety violations associated with the scaffolding installation were identified and restructured to prevent similar accidents. We have zero tolerance for contractors that violate the law, and the contract with the concerned sub-contractor was terminated after the investigation.

Health and safety inspections are carried out and recorded on a daily basis to ensure that all equipment meet safety standards and to eliminate any potential hazards in our construction sites. In case of any job-related or on-duty injury, a complete incident or accident report must be prepared by the relevant officers for further investigations and root cause analysis. We have created an internal instant messaging group to communicate with workers on immediate actions to be taken. Annual health checks are required for staff who are responsible for driving shuttle vehicles with a capacity of more than 15 people.

Our core principle is to create an injury-free working environment at the highest industry standard. We are dedicated to ensuring that our safety expectations are thoroughly understood and met through stringent management approaches, a robust site inspection mechanism and a number of effective communication channels. We will pursue continuous improvements to mitigate the risk of safety incidents and review any actions required to protect the health, safety and wellbeing of our employees. During the reporting year, we have achieved zero work-related fatalities incident among our employees.

Donated close to

OUR COMMUNITY

A team of

22full-time employees dedicated to CSR As our operations in Saipan continues to grow, we are aware of our responsibilities to support the local community to develop sustainably. Since the Group established its presence on Saipan in 2015, we have been carefully listening to and proactively addressing the needs of the local people. Approximately HK\$2.5 million were donated in 2017 by the Group to the community.

Reaffirming our commitment to facilitate help "for the locals, by the locals", the Group formed a Corporate Social Responsibility ("CSR") Team of 22 local employees to support our community work. Together with our community partners, our CSR Team annually sponsors and organises a wide range of initiatives to improve the livelihood of the people, conserve the natural environment of Saipan and preserve the local culture and history. This year alone, the team was involved in over 100 community initiatives to the local cause.

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CSR Team celebrating the local festival - Charter Day

Our contributions gained recognition from local community, the 19th CNMI Senate, the 19th CNMI House of Representatives and the Mayor's office.

CSR Team organizing fundraising event – "Hits for Hope" Softball Tournament

IPI is leading the way here in the CNMI by providing critical community support. Not only has IPI been financially supporting the American Red Cross and many other organisations, but they are also working tirelessly in our villages to make direct improvements in people's lives. – John Hirsh, American Red

ross

The Office of the Mayor of Saipan has been very fortunate to have joined with a great community partner – IPI-CSR – in making the island of Saipan a place where everyone living, working, doing business or just visiting, can call home. – David Apatang, Mayor of Saipan

The commitment to and support of our elders were factors in our choice of Imperial Pacific as our partner Thank you for taking care of us. We are so fortunate and are grateful to have you as our community partners.

- Rita Reyes, Saipan Seniors Advisory Council

OUR COMMUNITY

Empowering the Community

Villages in Saipan have a long history and rich culture which needs to be cherished and preserved. For this purpose, the CSR Team launched a long-term initiative, the Village Pride Project, to help revitalise the community and build lasting connections with the people of Saipan. Since its inception, the CSR Team has impacted 21 different villages and continued to make improvements to public facilities. Events and gatherings were also hosted in the villages to engage with the people. The Village Pride Project has engaged villages with a total of 5,000 villagers over the years, covering 10% of the Saipan population. With the success of the initiative, the CSR Team has expanded the Project to Saipan's neighbouring islands, namely, Tinian and Rota, with the aim of extending its impact to the CNMI.



CSR Team helping spruce up the public facility at the village

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Man'amko, the local term for the elderly, are highly respected in Saipan culture for their age, wisdom and contributions to society. Taking care of *man'amko* is highly appreciated among the locals and is a focus of the Group's CSR Team work. During the year, volunteers of the CSR Team reached out to local *man'amko* by paying regular visits to our elderly centre partners. Our volunteers paid a total of 7 visits to the elderly centres, where we performed and played games with over 200 *man'amko*. On Valentine's Day, Thanksgiving Day and other festivals, we hosted luncheons or dinners gatherings for the *man'amko* for celebration.



Volunteers paying visit to the elderly centre

Imperial Pacific International Holdings Limited ESG Report 2017



CSR Team rebuilds the Utt during Historic Preservation Month



CSR Team weaving as part of rebuilding the Utt

Preserving and Promoting the Local Culture

Saipan is an island with a diverse culture and historical significance. Being a member of the Saipan community, the CSR Team actively collaborates with local organisations at events to preserve and promote its rich culture and history. We partnered with the Marianas Visitors Authority and other government agencies in organising cultural events, including the Historic Preservation Month. This year, we staged the first Indigenous Cultural Expo on 9 October in partnership with the Women's Affairs Office, the Marianas Visitors Authority, the Public School system, the CNMI Women's Association and the Lady Diann Torres Foundation to celebrate CNMI Cultural Day. We took the lead in the planning, logistics, donations, advertising, promotion and manpower support of the event to showcase and expose the community to traditional historical cultural practices, especially those of the indigenous Chamorros and Carolinians.

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Conserving the Environment

As the tourist industry flourishes, the Group recognises the importance of protecting the natural landscape on the island. We aim to raise environmental awareness by encouraging both the locals and tourists to take on their social responsibility in environmental protection.

Beach clean-up events have been our signature CSR event which is in line with of our mission to drive sustainable tourism. The CSR Team has engaged the community and led local volunteers in 21 clean-up events to remove rubbish from most of the beaches on the island. We also took the opportunity to help communities in Rota and Tinian to clean up their beaches. With 21,000 hours of effort, we have collected over 900 kg of rubbish, which would otherwise have become marine debris.

Besides conserving the natural environment, improving the urban environment and infrastructure of the island are also keys to the sustainable development of Saipan. The School Pride Project, an initiative by the CSR Team to improve public facilities and greenery at local public schools, was successfully introduced in 2015 and is appreciated by students and parents. We have recurred the initiative in August 2017 to help schools to prepare for the opening of the 2017-2018 school year. Garapan Elementary School was the first to benefit from the initiative this year. Volunteers supported extensive redecoration and rehabilitation work such as the maintenance of school grounds, repairing an unsafe swing set and repairing and water blasting the basketball court. The CSR Team has also extended support in the form of donations to various school events to encourage student and family participation. Until today, the School Pride Project has partnered with 13 public schools.

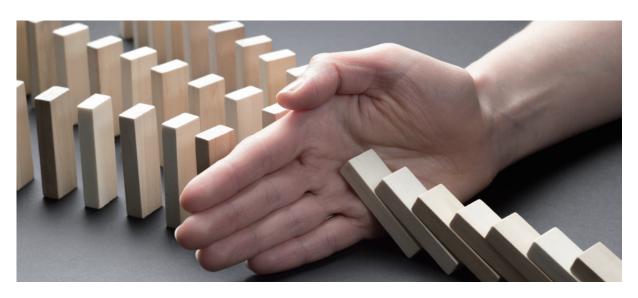


Volunteers at the Massive Beach Clean-up event



CSR Team partners with local schools to clean up and rehabilitate school facilities

OUR OPERATING PRACTICE







Our values guide the way we conduct business with our stakeholders. We incorporate responsible practices into our business operations to ensure ethical business conduct and outstanding service for our customers while responsibly managing our supply chain. To take this further, our commitment to business integrity and customer data privacy extends fully to our business partners to meet our sustainability goals.

Encouraging Responsible Gaming

We seek to offer our customers an enjoyable experience by providing a safe, secure and supportive environment. Recognising the potential risks of gambling, we take responsibility for making sure that our customers are aware of these risks too and are offered suitable assistance when needed.

As such, we invest heavily in training for employees and providing practical tools to customers on the topic of responsible gaming. It is mandatory for all our employees from every department to learn about responsible gaming on their first day and to attend refresher training whenever necessary. Such trainings enable employees to offer constructive assistance to our customers at all times regarding problem gaming issues. To be in line with the Commonwealth Casino Commission requirement, we ensure that information on the importance of responsible gaming and our Self-Exclusion Program are readily available to our customers in the form of pamphlets placed throughout the casino. Information on the national hotline and counselling service for problem gambling are available in the pamphlet to guide customers in obtaining professional help and support.

OUR OPERATING PRACTICE

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Additionally, we have established long-standing partnerships with local non-profit organisations and offer comprehensive solutions to address the community's specific needs. Through integrating the efforts of the community, we are in a better position to minimise the social impact of problem gaming.

Fighting against Corruption and Money Laundering

With the aim to achieve the highest ethical standards, the Group is dedicated to upholding all relevant laws and regulations. We maintain an open and transparent relationship with local regulatory agencies with integrity and honesty to ensure that we are in full compliance with the latest laws and regulations.

We do not tolerate bribery or corruption in any form in our business. Relevant policies and procedures have been implemented throughout our operations to promote governance and to hold us to our commitment. We expect our employees to support and participate in ethical business practices by complying with the guidelines in our employment policies. As stipulated in our policies, employees shall not solicit or accept gratuities, gifts, favours or anything of monetary value for their own use or that of a family member. Monetary gifts or favours exceeding US\$100 in retail value must be immediately brought to the attention of the Division Director or Department Head. To ensure that our employees are fully aware of these policies, we include sessions on anti-corruption in orientation trainings and annual refresher courses. Employees who fail to comply with the Group's standards may be subject to corporate and legal action. During the reporting period, no concluded legal cases regarding corrupt practices were brought against the Group or employees.

To ensure compliance with the USA Bank Secrecy Act ("BSA") and relevant regulations, the Group has adopted appropriate controls and measures to prevent money laundering and terrorist financing. This year, we launched an e-learning platform with a mandatory anti-money laundering ("AML") training modules to enhance the effectiveness and flexibility of employee's learning process. The platform targets to deliver practical techniques of identifying, managing and mitigating the inherent risk of money laundering. In addition to the mandatory AML training during orientation, four refresher modules on AML with 25 variations have been released on the e-learning platform. Appropriate training modules with multiple language options are available for each employee depending on their responsibilities and roles. All employees are required to participate in AML trainings annually.

OUR OPERATING PRACTICE

During the year, the Group has added significant resources to improving our internal controls and processes regarding AML. We introduced an intelligent computer software solution, to assist us to better manage, prevent and monitor money laundering risks and activities. We are the second casino in the United States to implement this system. In late 2017, we implemented a "Know Your Customer" process in our operations to enhance the due diligence of patrons. This new process not only allowed us to identify and verify the identity of our gaming customers with ease, but has also assisted us in storing and extracting relevant information for compliance purposes.

We have reviewed and updated relevant policies and procedures to include our Hong Kong and Macau operations based on local laws and regulations. Additional training was also provided for employees. Going forward, we will continue to review our AML practices regularly to ensure that our casino operation abides by all applicable laws and regulations in the CNMI, Hong Kong and Macau.

To facilitate the report and escalation of unethical and unlawful activities, we have developed an Employee Whistleblower Standard Operating Procedure to provide guidelines and protection to enable employees to report unlawful, dishonest or unethical conduct within the Group. Employees are encouraged to report such matters to their direct supervisors, managers or the Human Resources department through an internal whistleblower hotline or email account. The case will then be brought to the attention of the Investigation Team and Whistleblower Committee immediately for investigation and the identity of the whistleblower will be kept confidential.

Exceeding Customers' Expectations

We seek to create a memorable holiday experience and provide the highest quality service to customers once they set foot in our hotel and casino. We also take full responsibility in safeguarding their privacy and building customer trust.

OUR OPERATING PRACTICE

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The Group takes customer privacy very seriously and ensures customers' personal information are handled carefully. Appropriate policies and procedures are in place to ensure compliance with relevant laws and regulations. Correspondingly, personal information collection statements are included in documents when collecting relevant data to clearly inform data providers on the purpose and use of their information. Personal data is then stored in our newly introduced data management system and properly managed by our IT department under stringent security. To further strengthen our internal capabilities for protecting data privacy, employees are sponsored to attend external training on the use of the IGT system in Las Vegas, Nevada. During the year, there were no material substantiated complaints regarding customer privacy breaches or customer data losses.

Imperial Club, the loyalty program of the Group, is our key channel to promote communication and build long-term relationships with our customers. We encourage our customers to provide valuable feedback and comments on our operations and services to help formulate future improvements. The Group adheres to stringent customer service procedures that reinforce our commitment to quality service. In the case of complaints received by phone, email or in writing, the Imperial Club will follow up carefully and ensure a timely response within 5 working days. All six minor complaints received from Imperial Club members during the reporting year were handled appropriately by designated department.

Striving for a Sustainable Supply Chain

The Group recognises our business partners as valuable stakeholders in our business success. Together with our vendors, contractors and suppliers, we strive to provide premium products and services while working towards a sustainable supply chain. While sourcing from the local community remains a challenge for the Group due to Saipan's unique geographical location and regulatory barriers, it is our commitment to incorporate social and environmental considerations into our procurement practices. In order to minimise the environmental footprint of our supply chain, we have been actively searching for opportunities to source within Saipan and prioritise local suppliers whenever possible. During the reporting year, 32% of our suppliers were from Saipan.

Moving forward, we will continue to improve supply sustainability through effective collaborations with our business partners. As more restaurants are expected to open in our hotels in the coming year, our demand for food products will continue to grow and reducing the distance travelled by food products is our priority.

OUR ENVIRONMENT





We continuously seek improvements in constructing and operating a sustainable business and practicing conservation. The property management and property development teams manage the environmental impact at all stages of our projects and in all areas of our casinos. We strive to create a quality experience and to build desirable developments for our customers while leaving a positive legacy.

Committing to Environmental Protection

To realise our uncompromising commitment to ethical and responsible business practices, we developed our environmental policy with the goals of reducing greenhouse gas emissions, managing waste disposal, conserving energy and resources, and enhancing the natural environment. These policies form the cornerstone of environmental protection which will ensure ongoing sustainability in the future.

Commitments in Our Environmental Policy

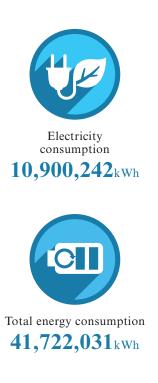
- 1. Promoting environmental sustainability in all our operations to comply with applicable and relevant federal, state and local laws and regulations.
- 2. Reviewing our business practices regularly to adapt current approaches to suit the environmental context.
- 3. Creating a workplace where our employees are engaged in environmental measures that contribute to energy conservation and waste reduction.
- 4. Disposing of waste thoughtfully, and developing an attitude of "reducing and recycling".

OUR ENVIRONMENT

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Energy and Environment

To improve our energy efficiency and reduce our carbon footprint, we encourage our employees to participate in behavioural energy saving initiatives. We aim to reduce our overall energy consumption by setting the temperature of our air-conditioners at $25 - 27^{\circ}$ C in summer, dressing appropriately to minimise the need for cooling and heating equipment, using daylight whenever possible to eliminate excessive lighting and turning off all electric appliances before leaving offices. In addition to optimising the energy efficiency of our offices, we are also developing a new building automation system to help manage energy, water and other resources in our hotels without adversely impacting the guest experience. LED lighting is deployed across our casinos and hotels. We also contribute to the environment through preserving the natural landscape of Saipan with our beach clean-up activities and other environmental initiatives. To further beautify nearby streets, we have implemented a series of vegetation programs and improved the pavement quality.













gas emissions (Scope 2)

121,819 tonnes CO₂e



Greenhouse gas emissions intensity

69 tonnes CO₂e per employee

OUR ENVIRONMENT

Waste and Sewage

By improving our waste management systems, we were able to create a tidier environment for our hotel and casino guests, and make our premises a safer and more efficient working place.

Initiatives have been put in place to meet local environmental requirements. We separate and recycle rubbish, reuse materials and pursue regeneration projects across our operations. We take responsibility for making enhancements not only to our own infrastructure, but also in the surrounding natural environment and communities.

We formulated strict protocols for contractors to handle non-hazardous waste, hazardous waste and chemicals appropriately. Subcontractors face significant social and environmental challenges with every construction project, we have therefore developed detailed systems that track all environmental data, including energy consumption, water usage, waste generation and recycling. 44 tonnes of non-hazardous waste were generated and disposed from our operations this year.

Saipan is located in the Pacific Ocean and heavy rains may occur during the rainy season causing coastal run-off. Hence, well managed sewage treatment is required to prevent contaminated water from overflowing into the sea causing pollution. During the year we have spent capital expenditure on a new drainage system to improve existing water channels and to prevent flooding risks.

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Aspect A1: Em	issions		
General Disclo	sure	Our Environment	22
KPI A1.1	Types of emissions and respective emissions data	Air emissions is not material to our operation.	_
KPI A1.2	Greenhouse gas emissions in total and, where appropriate, intensity	Our Environment	23
KPI A1.3	Total hazardous waste produced	There is no significant hazardous waste generated by the Group during the reporting period.	_
KPI A1.4	Total non-hazardous waste produced	Our Environment	24
KPI A1.5	Measures to mitigate emissions and results achieved	Our Environment	23
KPI A1.6	Description of how hazardous and non-hazardous waste is handled, reduction initiatives, and results achieved	Our Environment	24
Aspect A2: Use	of Resources		
General Disclo	sure	Our Environment	22
KPI A2.1	Direct and indirect energy consumption by type in total and intensity	Our Environment	23
KPI A2.2	Water consumption in total and intensity	Water is not considered as material issue to the Group. We will keep track on our water consumption as our Saipan operation continues to expand.	_
KPI A2.3	Energy use efficiency initiatives and results achieved	Our Environment	23
KPI A2.4	Water efficiency initiatives and results achieved	See reference for KPI A2.2.	_
KPI A2.5	Total packaging material used for finished products	Our operation does not involve in the use of packaging materials.	_
Aspect A3: The	Environment and Natural Resources		
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KPI A3.1	The significant impacts of activities on the environment and natural resources and the actions taken to manage them	Our Environment	22

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KPI B1.1	Total workforce by gender, employment type, age group and geographical region	Our People	9
KPI B1.2	Employee turnover rate by gender, age group and geographical region	Breakdown of employee turnover rate is currently not available.	_
Aspect B2: Hea	lth and Safety		
General Disclo	sure	Our People	11
KPI B2.1	Number and rate of work-related fatalities	Our People	11
KPI B2.2	Days lost due to work injury	Days lost due to work injury is currently not available.	_
KPI B2.3	Occupational health and safety measures adopted and how they are implemented and monitored	Our People	11
Aspect B3: Dev	elopment and Training		
General Disclosure Our People		Our People	10
KPI B3.1	The percentage of employees trained by gender and employee category	Breakdown of percentage of employees trained is currently not available.	_
KPI B3.2	The average training hours completed per employee by gender and employee category	Breakdown of average training hours completed per employee is currently not available.	-
Aspect B4: Lab	our Standards		
General Disclo	sure	Our People	8-9
KPI B4.1	Measures to review employment practices to avoid child and forced labour	Our operation has minimal risk of employing child and forced labour, therefore the issues are considered non- material.	_
KPI B4.2	Steps taken to eliminate such practices when discovered	See reference for KPI B4.1	_
Aspect B5: Sup	ply Chain Management		
General Disclo	sure	Our Operating Practice	21
KPI B5.1	Number of suppliers by geographical region	32% of our suppliers were from Saipan. The number of suppliers is currently not available.	_
KPI B5.2	Practices relating to engaging suppliers and number of suppliers	Our Operating Practice	21

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KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons	The Group does not deliver any tangible goods. We considered these issues non- material.	_
KPI B6.2	Number of products and service related complaints received and how they are dealt with	Our Operating Practice	21
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights	Intellectual property rights are not material to our operations.	-
KPI B6.4	Description of quality assurance process and recall procedures	Our operation does not involve the sale of any products.	_
KPI B6.5	Consumer data protection and privacy policies, how they are implemented and monitored	Our Operating Practice	20
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KPI B7.2	Preventive measures and whistle-blowing procedures, how they are implemented and monitored	Our Operating Practice	19-20
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