



# COMBEST HOLDINGS LIMITED 康佰控股有限公司\*

(Incorporated in the Cayman Islands with limited liability 於開曼群島註冊成立之有限公司)  
(Stock code 股份代號: 8190)

## Environmental, Social and Governance Report 環境、社會及管治報告

# 2017



# Contents 目錄

		Pages 頁碼
About this Report	有關本報告	2
Introduction	緒言	3
Stakeholders Engagement	持份者參與	4
Environmental Aspects	環境層面	6
Emissions	排放物	6
Use of Resources	資源使用	6
The Environment and Natural Resources	環境及天然資源	7
Social Aspects	社會層面	8
Employment and Labour Practices	僱傭及勞工常規	8
Employment	僱傭	8
Health and Safety	健康與安全	8
Development and Training	發展及培訓	10
Labour Standards	勞工準則	10
Operating Practices	營運慣例	11
Supply Chain Management	供應鏈管理	11
Product Responsibility	產品責任	12
Anti-Corruption	反貪污	13
Community	社區	14
Community Investment	社區投資	14
Environmental, Social and Governance Reporting Index	環境、社會及管治報告索引	15

## About this Report

### 有關本報告

Combest Holdings Limited (the “Company” together with its subsidiaries as the “Group”) is pleased to present the first Environmental, Social and Governance Report (the “Report”) to provide an overview of the Group’s management of significant issues affecting the operation, including environmental, social and governance issues. This Report is prepared by the Group with the professional assistance of APAC Compliance Consultancy and Internal Control Services Limited.

#### PREPARATION BASIS AND SCOPE

The Report is prepared in accordance with Appendix 20 to the Rules Governing the Listing of Securities on the Growth Enterprise Market of The Stock Exchange of Hong Kong Limited (the “GEM Listing Rules”) relating to “Environmental, Social and Governance Reporting Guide” (the “ESG Reporting Guide”) and has complied with the “comply or explain” provisions as set out in the GEM Listing Rules.

The Report summarizes the performance of the Group in respect of corporate social responsibility, covering its operation which is considered as material by the Group – namely (i) money lending represents, provision of credits (the “Money Lending Business”), (ii) advisory services includes provision of consultancy services and company secretarial services (the “Advisory Services Business”) in Hong Kong and (iii) investment management services to investment funds and managed accounts. In view of the first time of publish of the Report, only general disclosure of required aspects is disclosed. The Group will continue to optimize and improve according to the disclosure requirements. This Report shall be published both in Chinese and English. Should there be any discrepancy between the Chinese and the English versions, the English version shall prevail.

#### REPORTING PERIOD

This Report demonstrates our sustainability initiatives during the reporting period from 1 July 2016 to 30 June 2017.

#### CONTACT INFORMATION

The Group welcomes your feedback on this Report for our sustainability initiatives. Please contact us by email to [finance@combesthk.com](mailto:finance@combesthk.com).

康佰控股有限公司（「本公司」，連同其附屬公司統稱「本集團」）欣然提呈首份環境、社會及管治報告（「本報告」），以提供有關本集團管理影響其營運的重大事宜（包括環境、社會及管治事宜）的概覽。本報告乃由本集團在亞太合規顧問及內控服務有限公司的專業協助下編製。

#### 編製基準及範疇

本報告乃依照香港聯合交易所有限公司創業板證券上市規則（「創業板上市規則」）有關「環境、社會及管治報告指引」之附錄二十（「環境、社會及管治報告指引」）編製，並已遵守創業板上市規則所載之「不遵守就解釋」條文。

本報告概述本集團在企業社會責任方面的表現，涵蓋本集團認為屬重要的業務，即(i)放貸業務（指提供信貸）（「放貸業務」）；(ii)於香港提供顧問服務（包括提供諮詢服務及公司秘書服務）（「顧問服務業務」）；及(iii)向投資基金及管理賬戶提供投資管理服務。由於首次刊發此報告，故披露內容僅涉及規定層面的一般披露。本集團將根據披露規定不斷優化及改進。本報告以中、英文版本刊發。中、英文版本如有任何歧義，概以英文版本為準。

#### 報告期間

本報告闡述自二零一六年七月一日至二零一七年六月三十日之報告期間內本公司之可持續發展措施。

#### 聯絡資料

本集團歡迎閣下對本報告提出任何可持續發展措施方面的反饋，請電郵至 [finance@combesthk.com](mailto:finance@combesthk.com) 與本集團聯絡。





## Introduction 緒言

The Group is currently engaged in three business segments: the Money Lending Business, the Advisory Business and Investment Management Services to Investment Funds and Managed Accounts. Money lending represents, provision of credit, business will continue to be one of the major business segments of the Group and contribute stable interest income to the Group. The Group will further develop this business segment, diversify the customer portfolio, and seek new opportunities to cooperate with its business partners. For advisory services business, the Group has successfully identified a group of corporate clients and has been delivering on-going advisory services includes provision of consultancy services and company secretarial services. With the mission to be one of the prestigious consultancy firms in the industry, the Group strives to help its clients to achieve strategic goals and enhance corporate efficiency, performance and value and to improve its prevailing performance and position. Moreover, the Group provides investment management services to investment funds and managed accounts. It manages funds with total assets under management of more than HK2,300,000,000. Major funds include (i) TAR Private Equity Fund L.P., (ii) TAR Capital Fund SPC and (iii) TAR Opportunities Fund SPC.

The Group is committed to responsible operation and value creation for stakeholders and community by integrating environmental and social factors into management considerations. Sustainability strategy is based on the compliance with the legal requirements in the area we operate and opinions from stakeholders. It is crucial for the Group's growth in order to achieve business excellence and to build capabilities for long-term competitiveness. The Group has established and implemented various policies to manage and monitor the risks related to the environment, employment, operating practices and community. Details of the management approaches to sustainable development of different areas have illustrated in this Report.

本集團目前從事三個業務分部：放貸業務、顧問業務及向投資基金及管理賬戶提供投資管理服務。放貸指提供信貸，該業務將繼續為本集團主要業務分部之一，並繼續為本集團貢獻穩定利息收入。本集團將進一步發展該業務分部、實現客戶組合多元化及尋求與其業務夥伴合作之新機遇。就顧問服務業務而言，本集團已成功物色若干公司客戶，並一直提供持續顧問服務，包括提供顧問服務及公司秘書服務。本集團之目標乃成為業內享負盛名之顧問公司之一，故本集團致力協助其客戶達成策略目標並提升企業效率、表現及價值，以及改善其目前表現及狀況。此外，本集團向投資基金及管理賬戶提供投資管理服務。其所管理基金之管理資產總值超過2,300,000,000港元。主要基金包括(i) TAR Private Equity Fund L.P.；(ii) TAR Capital Fund SPC及(iii) TAR Opportunities Fund SPC。

透過將環境及社會因素納入管理考量，本集團致力進行有責任感的營運，為持份者及社區創造價值。可持續發展策略乃基於遵守本集團營運所在區域的法律規定及遵從持份者的意見。為取得業務優勢及培養長期競爭的能力，此乃本集團發展的關鍵。本集團已確立並實施多項政策以管理及監督與環境、僱傭、營運慣例及社區有關的風險。有關不同領域可持續發展管理辦法的詳情列示於本報告。

# Stakeholders Engagement

## 持份者參與

The Group acknowledges the importance of intelligence gained from the stakeholders' insights, inquiries and continuous interest in the Group's business activities. The following table provides an overview of the Group's key stakeholders and various platforms and methods of communication are used to reach, listen and respond.

本集團深明從持份者對本集團業務活動的見解、查詢及持續關注中獲得的訊息至關重要。下表提供本集團主要持份者及用於聯絡、聆聽及反饋的各種平台及溝通方法概覽。

Stakeholders 持份者	Issue of concern 關注事項	Engagement channel 參與渠道
Government and Market Regulators	<ul style="list-style-type: none"> <li>- Compliance</li> <li>- Promote regional economic development and employment</li> </ul>	<ul style="list-style-type: none"> <li>- Information disclosure</li> <li>- Annual and quarterly reports, announcement and other published information</li> </ul>
政府及市場監管機構	<ul style="list-style-type: none"> <li>- 合規性</li> <li>- 促進區域經濟發展及就業</li> </ul>	<ul style="list-style-type: none"> <li>- 資料披露</li> <li>- 年度及季度報告、公告及其他已刊發資料</li> </ul>
Shareholders and Investors	<ul style="list-style-type: none"> <li>- Return on the investment</li> <li>- Information disclosure and transparency</li> <li>- Protection of interests and fair treatment of shareholders</li> </ul>	<ul style="list-style-type: none"> <li>- Annual general meeting and other shareholder meetings</li> <li>- Annual and quarterly reports, announcement and other published information</li> </ul>
股東及投資者	<ul style="list-style-type: none"> <li>- 投資回報</li> <li>- 資料披露及透明度</li> <li>- 保障股東權益及公平對待股東</li> </ul>	<ul style="list-style-type: none"> <li>- 股東週年大會及其他股東大會</li> <li>- 年度及季度報告、公告及其他已刊發資料</li> </ul>
Employees	<ul style="list-style-type: none"> <li>- Safeguard the rights and interests of employees</li> <li>- Career development opportunities</li> <li>- Health and safety</li> </ul>	<ul style="list-style-type: none"> <li>- Training</li> <li>- Cultural and sport activities</li> <li>- Feedback box</li> </ul>
僱員	<ul style="list-style-type: none"> <li>- 保障僱員權益</li> <li>- 職業發展機遇</li> <li>- 健康與安全</li> </ul>	<ul style="list-style-type: none"> <li>- 培訓</li> <li>- 文化及體育活動</li> <li>- 反饋箱</li> </ul>

# Stakeholders Engagement

## 持份者參與

Stakeholders 持份者	Issue of concern 關注事項	Engagement channel 參與渠道
Customers 客戶	<ul style="list-style-type: none"> <li>– Safe and high-quality services</li> <li>– Privacy and information protection</li> <li>– 安全及優質服務</li> <li>– 私隱及資料保障</li> </ul>	<ul style="list-style-type: none"> <li>– Email and customer service hotline</li> <li>– Customer's survey</li> <li>– Visits and meetings</li> <li>– 電郵及客戶服務熱線</li> <li>– 客戶調查</li> <li>– 考察及會議</li> </ul>
Suppliers/Partners 供應商合作夥伴	<ul style="list-style-type: none"> <li>– Long-term partnership</li> <li>– Honest cooperation</li> <li>– Fair, open</li> <li>– Risk reduction</li> <li>– 長期合夥關係</li> <li>– 誠實合作</li> <li>– 公平公開</li> <li>– 減低風險</li> </ul>	<ul style="list-style-type: none"> <li>– Regular meeting</li> <li>– Tendering process</li> <li>– Strategic corporation</li> <li>– 定期會議</li> <li>– 招標程序</li> <li>– 策略合作</li> </ul>
Peer/Industry Associations 同行／行業協會	<ul style="list-style-type: none"> <li>– Experience sharing and corporations</li> <li>– Fair competition</li> <li>– 經驗分享及合作</li> <li>– 公平競爭</li> </ul>	<ul style="list-style-type: none"> <li>– Industry conference, seminars</li> <li>– Site visit</li> <li>– 行業會議及研討會</li> <li>– 實地考察</li> </ul>
Public and Communities 公眾及社區	<ul style="list-style-type: none"> <li>– Community involvement</li> <li>– Social responsibilities</li> <li>– 社區參與</li> <li>– 社會責任</li> </ul>	<ul style="list-style-type: none"> <li>– Community involvements</li> <li>– 社區參與</li> </ul>

# Environmental Aspects

## 環境層面

### EMISSIONS

In the Group, we are committed to continuously improving the environmental sustainability of our business. In striving to do the right thing as a company, we recognize that we have an obligation to reduce the impact of our operations and be accountable for the resources and materials we use each day.

The Group is mainly involved in office operation only. The Group's "Corporate Environmental Policy" encompasses our general approach towards controlling environmental impacts of the business operation. The Group's most significant environmental impacts are greenhouse gas ("GHG") emissions from energy consumptions in our facilities. The Group's businesses are mostly carried out locally in offices in Hong Kong. In line with our policy to minimize emissions, the Group has implemented energy saving practices which are mentioned in the section of "Use of Resources" in order to reduce the GHG emissions. Moreover, offices are equipped with audio conferencing facilities to minimize the need for face to face meetings, keeping business travelling to a minimum and currently only a small percentage of employees travel for business. There are no relevant laws and regulations applicable to our business on this aspect.

### USE OF RESOURCES

The Group places a high priority on the efficient use of resources. As stipulated in the Group's "Corporate Environmental Policy", the Group strives to improve the efficient use of natural resources, including energy such as minimize waste streams and emissions and implement effective recycling program. Practical measures are implemented according to the "Environmental Office Practices" as follows:

#### Paper Saving

In office, we encourage the employee to use both sides of paper and use suitable font size/shrinkage mode to minimise pages, if possible. Besides, electronic media is recommended for circulation/communication, to minimize using paper.

### 排放物

本集團致力於不斷改善業務環境層面之可持續發展。作為一間公司，致力於作出正確之舉的同時，本集團意識到其有責任減低營運造成的影響，並對每日所用資源及物料負責。

本集團僅主要涉及辦公室業務。本集團之「企業環境政策」包括對控制業務營運之環境影響之一般方針。本集團最重大之環境影響為來自設施耗電之溫室氣體（「溫室氣體」）排放。本集團大部分業務均於香港本地辦事處進行。遵照本集團的減排政策，本集團已實施「資源使用」一節所述之節能措施，以減少溫室氣體排放。此外，辦公室配備音頻會議設施，以盡量減少面對面會議的需要，令差旅減至最少，目前僅一小部分僱員需要出差。就此而言，概無相關法律及法規適用於本集團之業務。

### 資源使用

本集團重視以具效率方式使用資源。誠如本集團「企業環境政策」所訂明，本集團致力提高電力等天然資源之使用效率，包括盡量減少廢物產生及排放，以及實施有效回收計劃。根據「環保辦公室常規」已實施之實際措施如下：

#### 節省用紙

於辦公室，本集團鼓勵僱員在可行情況下雙面使用紙張及採用合適字體大小／縮小模式以盡量減少頁數，另外亦建議採用電子媒體傳閱／通訊，以盡量減少用紙。



## Environmental Aspects 環境層面

### Water Conservation

Employee should report leaking faucet or pipe to the relevant authority and turn off the tap when not in use.

### Electricity Conservation

The electrical appliance should be set as energy saving mode where possible. For computers, the idle automatically mode is 20 minutes or less. The room temperature should be set in a range from 20°C to 25.5°C. Also, unnecessary lighting and power supply should be switched off when they are not in use.

### Green Pantry

Employee are encouraged to use reusable cutleries, cups and glasses and environmental friendly cleaning products (e.g. biodegradable or phosphate free detergent, refillable soap, etc.).

### Materials Re-use and Stationary Conservation

Waste papers are used as fillers for packing and/or reduce using fillers, if possible. Employee should handle and store materials carefully to reduce breakage and wastage. Boxes/fillers/other materials are reused for packaging/storage/delivery. Environmental friendly stationery is suggested to use. Cord binder, envelopes and other materials or stationery should be reused until worn out.

## THE ENVIRONMENT AND NATURAL RESOURCES

According to the Group's "Environmental Policy", the Group raises staff's awareness on environmental issues through education and training and enlist employees' support in improving the Group's performance, promote environmental awareness amongst our customers, business partners and shareholders and support community activities in relation to environmental protection and sustainability and evaluate regularly and monitor past and present business activities impacting upon health, safety and environmental matters. With the integration of policies mentioned in section "Emissions" and "Use of Resource", the Group strives to minimize the impacts to the environment and natural resources.

### 節約用水

僱員應向相關部門報告水龍頭或水管滲漏情況，並在無人使用時關上水龍頭。

### 節約用電

在可行情況下，電器應設為省電模式。就電腦而言，自動閒置模式為20分鐘或以內。室溫應設在攝氏20度至25.5度之範圍內。另外，在無人使用時應關上不必要之照明設備及電源。

### 綠色茶水間

本集團鼓勵僱員使用可重複使用之餐具、茶杯及水杯以及環保清潔產品（例如可生物降解或無磷酸鹽洗滌劑、可補充肥皂等）。

### 重用物料及節省使用文具

在可行情況下，廢紙用作包裝填充物及／或減少使用填充物。僱員應小心處理及儲存物料，以減少破損及浪費。箱／填充物／其他物料重新用於包裝／儲存／運輸，並建議使用環保文具。線纜縛索、信封及其他物料或文具應重複使用，直至磨損為止。

### 環境及天然資源

根據本集團之「環境政策」，本集團透過教育及培訓提高員工對環境議題之關注，並在改善本集團表現方面獲員工支持；提高客戶、業務夥伴及股東之環境意識並支持有關環保及可持續發展之社區活動；以及定期評估及監察過去及目前業務活動對健康、安全及環境方面之影響。透過整合「排放物」及「資源使用」兩節所述之政策，本集團力求盡量減低對環境及天然資源之影響。



# Social Aspects

## 社會層面

### EMPLOYMENT AND LABOUR PRACTICES

#### Employment

Being in the financial services industry, our people are our most important asset that drives the long-term development and sustainability of the Group. The Group has established and implemented a set of human resources management policies and procedures in place with the aim to provide ideal working environment to its staff in order to comply with local employment laws and regulations, such as Employment Ordinance in Hong Kong. The Group's staff handbook sets out the Group's standards for compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare. The remuneration management aims to attract potential employees and motivate current staff. Employees receive social welfare benefits and other benefits. All employees are treated equally and their employment, remuneration and promotion opportunities will not be affected by their nationality, race, age, religion and marital status.

We provide competitive and attractive remuneration package to reward and retain our employees. The package includes basic salary, allowance, Mandatory Provident Fund (MPF) and required social security benefits to variable incentive-based remuneration such as discretionary bonus.

During the reporting period, no non-compliance regarding employment brought against the Group or its employees were noted.

#### Health and Safety

In the daily operation of the Group, there is no significant hazards as compared to industries like manufacturing and mining etc. The Group aims to enhance wellness of the employee by providing a harmonious and comfortable environment. The Group has adhered with related laws and regulations, such as Occupational Safety and Health Ordinance in Hong Kong. As stipulated in the Group's "Guidelines on Occupational Health and Safety", the Group have implemented measure in the following aspects.

### 僱傭及勞工常規

#### 僱傭

於金融服務業，本集團之員工為推動本集團長期發展及可持續發展之最重要資產。為遵守本地僱傭法例及法規（如香港《僱傭條例》），本集團已設立並實施一套人力資源管理政策及程序，旨在為員工提供理想工作環境。本集團的員工手冊載列本集團之薪酬及遣散、招聘及晉升、工時、休息時間、平等機會、多元化、反歧視等標準，以及其他福利及待遇。薪酬管理旨在吸引潛在員工及激勵現有員工。僱員可獲社會福利津貼及其他待遇。所有僱員均獲平等對待，而彼等的聘用、薪酬及晉升機會不受國籍、種族、年齡、宗教及婚姻狀況影響。

本集團提供具競爭力及吸引力之薪酬組合以獎勵及留聘僱員。組合包括基本薪金、津貼、強制性公積金（強積金）、必要社會保障福利及浮動獎勵酬金（如酌情花紅）。

於報告期間，本集團或其僱員並無注意到有關僱傭之不合規情況。

#### 健康與安全

與製造業及礦業等行業相比，本集團日常營運中並無重大危險。本集團透過提供和諧及舒適的環境，旨在提升員工的健康水平。本集團已遵守相關法例及法規，如《香港職業安全及健康條例》。按照本集團「職業健康及安全指引」規定，本集團已於下列方面實施措施。



## Social Aspects 社會層面

### *Lighting*

Good lighting conditions in the workplace enable the staff to see comfortably and avoid possible danger. Fluorescent lights recessed into the false ceiling and fitted with louver or diffuser to control glare and distribution of light. Blinds or curtains should be used to prevent glare and control the lighting level. Anti-glare filters can be used if necessary to reduce screen reflection and improve visual quality of the display.

### *Indoor Air Quality and Ventilation*

Smoking is prohibited in all workplace and indoor area of the office. The indoor temperature and humidity are controlled in an optimum level to make the workplace more comfortable and help preventing bacteria from flourishing. Air outlets to be cleaned regularly in the office to reduce the dust level of indoor air and increase efficiency of the ventilation system.

### *Office Furniture/Working Posture*

Staffs are provided with adjustable chairs to allow them to adjust the seat height. To enable the staff having a comfortable work office, staffs should assume correct seated posture so as to avoid musculoskeletal injury.

### *Office Equipment*

Carbon powder used in photocopiers may contain harmful substances. During photocopying, it is necessary to place the cover properly to prevent eye irritation from the strong light. All office equipment will be properly maintained in good conditions as well.

### *Manual Work Handling*

Heavy manual handling work should be minimized in the office. Risk assessment should be conducted for unavoidable manual handling operations before it is undertaken.

### *照明*

工作場所中良好的照明狀況使員工能可看得舒適及避免潛在危險。熒光燈嵌入假天花板，並配有百葉窗或擴散器，以控制眩光及光線分佈。使用窗簾或簾子以防止眩光並控制照明程度。如有需要，可使用防眩光過濾器減少屏幕反射並提高顯示器的視覺質素。

### *室內空氣質量及通風*

辦公室的所有工作場所及室內範圍禁止吸煙。室內溫度及濕度控制在最佳水平，使工作場所更舒適，並有助於防止細菌繁殖。經常清潔辦公室內的出風口，以減少室內空氣的灰塵，提高通風系統效率。

### *辦公室傢俬／工作姿勢*

員工配有可調節的椅子，彼等可調整座椅高度。為使員工有舒適工作場所，員工應保持正確坐姿，以避免肌肉骨骼損傷。

### *辦公室設備*

影印機所使用的碳粉可能含有有害物質。於影印過程中，必須妥善蓋上蓋板以防止強光刺激眼睛。所有辦公室設備亦將妥為維持於良好狀態。

### *人工作業*

辦公室內應盡量減少繁重的人工作業。於進行不可避免之體力處理操作前，應進行風險評估。

## Social Aspects

### 社會層面

#### *Others Safety Measures*

All the fire safety equipment has to be checked and complied with the fire safety rules in the office. First aid box has been placed in the office. The items as required to be provided in the first aid box are in compliance with the regulation of Occupational Safety and Health Council as issued by the Labor Department.

During the reporting period, there was no related work injuries or fatalities and no legal case regarding health and safety brought against the Group.

#### **Development and Training**

The Group provides comprehensive training to employees to promote a learning culture based on the Group's staff handbook and "Training policies. The Group provides diversified on-the-job training to employees. Orientation training enables new employee to familiar with the corporate culture and the background of the company. The Group also encourages self-development of employees through taking up of external training programmes relevant to their jobs. The Group believes development of employee is crucial to the sustainable development of the business. The Group will enhance the training system in order to improve the personal development of employee.

#### **Labour Standards**

According to the Group's "Code of Conduct" in the staff handbook, the Group strives to provide a fair, equal opportunity, respectful and pleasant work environment to all employees. All practices are designed to ensure that all individuals of the corporation are recruited, hired, assigned, trained, promoted, compensated and retained on the basis of their qualifications, experience and/or the terms and conditions, and treated equally in these respects without regard to race, color, creed, religion, sex, sexual orientation, age, marital status, national origin, disability or family status. The Group requires that the office work environment be free from all forms of discrimination and harassment. There is no significant risk related to recruitment of child labour as the Group's business requires employee equipped with specialized skills and adequate educational background.

#### *其他安全措施*

須經常檢查所有消防安全設備並符合辦公室的消防安全規定。急救箱已放置於辦公室內。急救箱所要求的物品符合勞工處發出的《職業安全健康局條例》。

於報告期間，本集團並無相關工傷或死亡事故，亦無對本集團提出有關健康及安全的法律案件。

#### **發展及培訓**

本集團根據其員工手冊及「培訓政策」為僱員提供全面培訓，以推動學習文化。本集團為僱員提供多元化的在職培訓。入職培訓可令新僱員熟習本公司之企業文化及背景。本集團亦鼓勵僱員透過參加與彼等工作相關的外部培訓課程，實現自我發展。本集團相信，僱員發展對業務的可持續發展而言至關重要。本集團將加強培訓制度，以提升僱員的個人發展。

#### **勞工準則**

根據本集團員工手冊內之「行為守則」，本集團致力向全體僱員提供公平及平等之機會，以及備受尊重及愉快之工作環境。本集團制訂一切常規以確保公司所有人員均按彼等之資歷、經驗及／或條款及條件獲招聘、聘用、調派、培訓、晉升、補償及留聘，並在此等方面得到平等待遇，而不論種族、膚色、信仰、宗教、性別、性取向、年齡、婚姻狀況、國籍、殘疾或家庭狀況。本集團要求辦公室之工作環境不存在任何形式之歧視及騷擾。由於本集團業務需要僱員具備專門技能及充分教育背景，故並無有關招聘童工之重大風險。

The Group has been in strict compliance with the requirements of the legislation on anti-discrimination in Hong Kong, including Sex Discrimination Ordinance, Disability Discrimination Ordinance, Family Status Discrimination and Race Discrimination Ordinance. During the reporting period, no non-compliance regarding labour standards brought against the Group or its employees were noted.

### OPERATING PRACTICES

#### Supply Chain Management

The Group's business nature is service-orientated. Therefore, we have relatively fewer suppliers and a less complicated supply chain. Our main suppliers are only involved in third-party services providers such as information technology service, property management service, advertising service, legal and consulting service, office equipment, printing and stationery suppliers. The Group has established "Supply Chain Policy" to ensure our suppliers meet our standards of technical competence, innovation, product quality, reliability and delivery performance, financial soundness, ethics and social responsibility.

During engagement with new supplier such as new system and software vendor selection, we ensure that the new system is compatible with our current system to minimise undesirable replacements and reassure the new system security by multiple rounds of testing. To provide a fair overview on supplier selection, we opt to select more than one supplier for comparison purpose during the primary engagement process.

本集團一直嚴格遵守香港反歧視法律之規定，包括《性別歧視條例》、《殘疾歧視條例》、《家庭崗位歧視條例》及《種族歧視條例》。於報告期間，本集團或其僱員並無注意到有關勞工準則之不合規情況。

#### 營運慣例

##### 供應鍊管理

本集團之業務性質以服務為本。因此，本集團的供應商相對較少，而供應鍊亦相對不複雜。本集團之主要供應商僅涉及第三方服務供應商，如資訊科技服務、物業管理服務、廣告服務、法律及諮詢服務、辦公設備、印刷及文具供應商等。本集團已制訂「供應鍊政策」，以確保供應商符合技術能力、創新、產品質量、可靠性及交付表現、財務穩健性、道德及社會責任標準。

於委聘新供應商（例如選擇新系統及軟件銷售商）時，本集團確保新系統與現有系統兼容，以盡量減少不必要的更換，並透過進行多次測試保證新系統安全。為於選擇供應商時對供應商作出公平評價，本集團會於初步委聘程序中選擇多於一間供應商以作對比。



## Social Aspects

### 社會層面

#### Product Responsibility

Providing efficient and high-quality service to customers are the utmost concern for the Group. The Group has been in strict compliance with related laws and regulations, including but not limited to Trade Description Ordinance and the Competition Ordinance. Our aim is for our customers to have confidence in our services, and sufficient information to make informed choices. Therefore, the Group has a set of policies and procedures to oversee and manage issues related to quality management, complaint handling and customer data information protection and privacy.

#### Quality Management

The Group has established “Quality Management Policy” with aims to add value for our clients through our business processes that support the services offered. To enhance our service quality, the Group collects customers’ feedback on services provided. The Group guides staff to familiarize with the standard operational procedures. The Group is committed to provide quality service to customers through improving the administrative ability of senior management and the functional capability of operation staff.

#### Customer Data Protection and Privacy

The Group upholds a belief that information security and privacy is the key principle for operation. According to the Group’s staff handbook, employee is required protect all the customers’ information. Information only can be used in authorized business activities. If employee disclose those information to other parties, it is considered as data theft. The related employee’s employment will be terminated.

#### 產品責任

向客戶提供具效率及優質服務為本集團最關注之事項。本集團一直嚴格遵守相關法律及法規，包括但不限於《商品說明條例》及《競爭條例》。本集團的目標為令客戶對本集團的服務充滿信心，並擁有充足資料作出知情選擇。因此，本集團訂有一套政策及程序以監督及管理有關質量管理、投訴處理以及客戶資料保障及私隱等問題。

#### 質量管理

本集團已制訂「質量管理政策」，旨在通過支持所提供服務的業務流程為客戶增值。為提高服務質量，本集團收集客戶對所提供服務的意見。本集團指引員工熟悉標準操作程序。本集團致力於通過提高高級管理層的行政能力及營運人員的職能能力，為客戶提供優質服務。

#### 客戶資料保障及私隱

本集團堅信資料安全及私隱乃營運的關鍵原則。根據本集團之員工手冊，僱員須保護所有客戶資料。資料僅可用於獲授權之業務活動。倘僱員向其他人士披露該等資料，此舉會被視為資料竊取。有關僱員將被終止僱用。

### Anti-Corruption

In the Group's staff handbook, one of the most important rules that the Group requires all employee to avoid any relationship, influence, interest or activity that could compromise the best interest of the Group. As part of their responsibility, all employees should avoid any position whereby their judgment, decision or influence on behalf of the Group may give rise to their personal interests, finance and/or other means of interest. They should ensure that dealings with clients, suppliers, contractors, job applicants, colleagues or any other third party are met with good judgment, careful observance of all applicable laws and regulations, and the highest standard of integrity at all times.

As stipulated in the Group's "Whistleblowing Policy", employees could raise concerns about any suspected misconduct or malpractice verbally or in writing. The Group will make every effort to treat all reporting in a strictly confidential manner. The identity of the employee making the report and complaint will not be disclosed without such employee's consent, unless the Group is legally obliged to reveal the employee's identity and other information. In cases of suspected corruption or other criminal offences, a report will be made to the Independent Commission Against Corruption (ICAC) or the appropriate authorities.

The Group has been in strict compliance with Prevention of Bribery Ordinance in Hong Kong. During the reporting period, there was no any legal case regarding corrupt practices brought against the Group or its employees.

### 反貪污

於本集團之員工手冊內，最重要的規則之一為本集團要求全體僱員避免產生任何可能損害本集團最佳利益的關係、影響、利益或活動。避免代表本集團作出可能產生其個人權益、財務及／或其他利益的判斷、決定或影響乃全體僱員的部分責任。彼等應確保與客戶、供應商、承包商、應徵者、同事或任何其他第三方之間的交易於任何時候均作出良好判斷，審慎遵守所有適用法例及法規，並符合最高道德標準。

誠如本集團之「舉報政策」所規定，員工可以口頭或書面形式對涉嫌不當行為或不當行為提出疑慮。本集團將盡全力以嚴格保密的方式對待所有舉報。除非本集團有法律責任須披露員工的身份及其他資料，否則作出舉報及投訴的該名員工的身份在未經其本人同意之情況下不得披露。如有懷疑干犯貪污或其他刑事罪行，將向廉政公署或有關當局作出舉報。

本集團一直嚴格遵守香港《防止賄賂條例》。於報告期間，本集團或其僱員並無涉及任何有關貪污行為的法律案件。

# Social Aspects

## 社會層面

### COMMUNITY

#### Community Investment

As a socially responsible company, the Group is committed to understanding the needs of the communities in which we operate. The Group has adopted “Community Investment Policy”, which aims to build trust and stable relationship with our stakeholders. The Group strives to contribute to the society by focusing on four area including living standard of the community, culture, education and development and labour cooperation.

- *Living Standard of Community*  
We improve the living standard of the community by serving the local underprivileged. For example, we provide development opportunities, health care and sport activities.
- *Culture Projects*  
The Group has recognized culture is a key part of our heritage and history. We support high quality cultural projects, which can both enhance the living standards and encourage creativity.
- *Education and Development*  
The Group believes that education and development can help the future leaders to equip skills and knowledge support all the trainings and skill developments related to the Groups’ business. It is because education, professional employees and creativity are the main driving force for sustainable development.
- *Labour Cooperation*  
The Group respects the freedom of association and the right of collective bargaining of employee. We encourage communication between management team and employee by establishment of a channel for employee feedback.

The Group will continue to contribute to the sustainable development of the community by building a healthy and dynamic community.

### 社區

#### 社區投資

作為一間對社會負責任之公司，本集團致力了解營運所在社區的需要。本集團已採取「社區投資政策」，旨在與持份者建立信任及穩定的關係。本集團通過專注於四個方面，包括社區的生活水平、文化、教育及發展以及勞工合作，力爭為社會作出貢獻。

- *社區生活水平*  
本集團透過服務本地弱勢社群提升社區生活水平。例如，本集團提供發展機會、醫療及體育活動。
- *文化項目*  
本集團深明文化乃遺產及歷史的重要部分。本集團支持優質文化項目，其既可提升生活水平，亦可鼓勵創意。
- *教育及發展*  
本集團相信，教育及發展有助未來領導人掌握技能及知識，以支持所有有關本集團業務的培訓及技能發展。其原因在於教育、專業的僱員及創造力乃可持續發展的主要推動力。
- *勞工合作*  
本集團尊重僱員的結社自由及集體談判的權利。本集團設立僱員意見反映渠道，鼓勵管理層與僱員之間進行溝通。

本集團將透過建設健康及活力的社區繼續為社區的可持續發展作出貢獻。

# Environmental, Social and Governance Reporting Index

## 環境、社會及管治報告索引

Subject areas, aspects, general disclosures and Key Performance Indicators (KPIs) 主要範疇、層面、一般披露及關鍵績效指標		Section 章節	Page 頁次
<b>A. Environmental</b>			
<b>A. 環境</b>			
<b>Aspect A1 Emissions</b>			
<b>層面A1排放物</b>			
A1	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	"Emissions"	6
A1	一般披露有關廢氣及溫室氣體排放、向水及土地的排污、有害及無害廢棄物的產生等的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	「排放物」	6
<b>Aspect A2 Use of Resources</b>			
<b>層面A2資源使用</b>			
A2	General Disclosure Policies on the efficient use of resources, including energy, water and other raw materials.	"Use of Resources"	7-8
A2	一般披露有效使用資源（包括能源、水及其他原材料）的政策。	「資源使用」	7-8
<b>Aspect A3 The Environment and Natural Resources</b>			
<b>層面A3環境及天然資源</b>			
A3	General Disclosure Policies on minimising the issuer's significant impact on the environment and natural resources.	"The Environment and Natural Resources"	8
A3	一般披露減低發行人對環境及天然資源造成重大影響的政策。	「環境及天然資源」	8



# Environmental, Social and Governance Reporting Index

## 環境、社會及管治報告索引

<b>Subject areas, aspects, general disclosures and Key Performance Indicators (KPIs)</b>		<b>Section</b>	<b>Page</b>
主要範疇、層面、一般披露及關鍵績效指標		章節	頁次
<b>B. Social</b>			
<b>B. 社會</b>			
<b>Employment and Labour Practices</b>			
僱傭及勞工常規			
<b>Aspect B1 Employment</b>			
層面B1僱傭			
B1	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	“Employment”	9
B1	一般披露有關薪酬及解僱、招聘及晉升、工作時數、假期、平等機會、多元化、反歧視以及其他待遇及福利的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	「僱傭」	9
<b>Aspect B2 Health and Safety</b>			
層面B2健康與安全			
B2	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	“Health and Safety”	10-11
B2	一般披露有關提供安全工作環境及保障僱員避免職業性危害的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	「健康與安全」	10-11

# Environmental, Social and Governance Reporting Index

## 環境、社會及管治報告索引

Subject areas, aspects, general disclosures and Key Performance Indicators (KPIs) 主要範疇、層面、一般披露及關鍵績效指標		Section 章節	Page 頁次
<b>B. Social</b>			
<b>B. 社會</b>			
<b>Employment and Labour Practices</b>			
僱傭及勞工常規			
<b>Aspect B3 Development and Training</b>			
層面B3發展及培訓			
B3	General Disclosure Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	"Development and Training"	12
B3	一般披露有關提升僱員履行工作職責的知識及技能的政策。 描述培訓活動。	「發展及培訓」	12
<b>Aspect B4 Labour Standards</b>			
層面B4勞工準則			
B4	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	"Labour Standards"	13
B4	一般披露有關防止童工或強制勞工的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	「勞工準則」	13
<b>Operating Practices</b>			
營運慣例			
<b>Aspect B5 Supply Chain Management</b>			
層面B5供應鏈管理			
B5	General Disclosure Policies on managing environmental and social risks of the supply chain.	"Supply Chain Management"	14
B5	一般披露管理供應鏈的環境及社會風險政策。	「供應鏈管理」	14

# Environmental, Social and Governance Reporting Index

## 環境、社會及管治報告索引

Subject areas, aspects, general disclosures and Key Performance Indicators (KPIs) 主要範疇、層面、一般披露及關鍵績效指標		Section 章節	Page 頁次
<b>Aspect B6 Product Responsibility</b>			
<b>層面B6產品責任</b>			
B6	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	“Product Responsibility”	15
B6	一般披露有關所提供產品和服務的健康與安全、廣告、標籤及私隱事宜以及補救方法的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	「產品責任」	15
KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	“Product Responsibility – Customer Data Protection and Privacy”	15
關鍵績效 指標B6.5	描述消費者資料保障及私隱政策，以及相關執行及監察方法。	「產品責任－客戶資料 保障及私隱」	15
<b>Aspect B7 Anti-corruption</b>			
<b>層面B7反貪污</b>			
B7	General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	“Anti-Corruption”	16
B7	一般披露有關防止賄賂、勒索、欺詐及洗黑錢的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	「反貪污」	16

# Environmental, Social and Governance Reporting Index

## 環境、社會及管治報告索引

Subject areas, aspects, general disclosures and Key Performance Indicators (KPIs) 主要範疇、層面、一般披露及關鍵績效指標		Section 章節	Page 頁次
<b>Community</b>			
社區			
<b>Aspect B8 Community Investment</b>			
層面B8社區投資			
B8	General Disclosure Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	"Community Investment"	17
B8	一般披露有關以社區參與來了解營運所在社區需要和確保其業務活動會考慮社區利益的政策。	「社區投資」	17