

BUSINESS

OVERVIEW

We are a Hong Kong-based pain management and function enhancement services provider operating under our “ANKH” brand. The name “ANKH” stands for “A New Key to Health”. We were established in 2007 and have over 18 years of experience in healthcare.

We offer a range of non-surgical, non-invasive and non-pharmacological pain management therapies, function enhancement therapies, and topical use and dietary supplement products to our customers. Our services aim to eliminate pain points, invigorate blood circulation, enhance the body’s detoxification function, strengthen muscle and joint, and enhance functionality. For detail, please refer to the section “Business – Our Services and Products – Pain management and function enhancement services” below.

The theoretical basis of our therapies is “RDS+” (Restore, Detox, and Strengthen) approach, which is inspired by the concept of the meridian system (經絡) of Traditional Chinese Medicine. We combine Traditional Chinese Medicine concepts with energy-based treatment and therapy devices that we source internationally. For details, please refer to the sections headed “Business – Our Strengths – Commitment to continuous development and innovation in non-surgical, non-invasive and non-pharmacological pain management and functional enhancement” and “Business – Our Strengths – Integration of Traditional Chinese Medicine Theory with Energy-Based Technologies”.

We evaluate and assess our treatment devices before they are deployed. Our treatments and therapies are developed to be free from pharmaceutical products and invasive procedures.

In aggregate, our trained therapists performed over 364,000 treatment sessions during the Track Record Period. The average annual spending of each customer at our service centres was approximately HK\$49,000, HK\$50,500 and HK\$60,000 for FY2024, FY2025 and FY2026 respectively, representing an increase of approximately 3% from FY2024 to FY2025 and 19% from FY2025 to FY2026.

The table below sets out selected financial information for the years indicated:

	FY2024	FY2025	FY2026	Change from FY2024 to FY2025	Change from FY2025 to FY2026
Total revenue	HK\$319.2 million	HK\$311.9 million	HK\$367.5 million	-2.3%	+17.8%
Profit for the year	HK\$79.8 million	HK\$33.9 million	HK\$37.8 million	-57.5%	+11.5%

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OUR STRENGTHS

Commitment to continuous development and innovation in non-surgical, non-invasive and non-pharmacological pain management and functional enhancement

The Group commenced operations in 2007 and has over 18 years of experience in healthcare. Some pain management options may include surgical, invasive or medication-based treatments, which may involve recovery time, physical discomfort, procedural risks or potential side effects from medication. Thus, our business objective is to offer alternative pain management services designed to alleviate pain and improve physical function through non-surgical, non-invasive and non-pharmacological approaches.

Since our inception, we have grown from boutique centres to larger-scale service centres currently located in Sha Tin, Tsim Sha Tsui and Causeway Bay. This expansion not only reflects the natural progression of our business and the consolidation of our operating experience, but also enables us to serve a broader customer base, collect more customer feedback and better understand evolving customer needs, while our focus on pain management and wellness has remained unchanged. Based on our accumulated experience and observations of customers' needs, we developed our RDS+ framework, which allows us to provide a more comprehensive "one-stop" service model covering restoration, detoxification and strengthening. Depending on each customer's condition and needs, the Restore, Detox and Strengthen functions may be applied within the same therapy session or across follow-up sessions. For example, certain body parts may require restoration or detoxification, while other body parts may require strengthening. This flexible framework enables us to provide more tailored treatments, address both pain management and ongoing functional enhancement needs, cater to a wider range of customers, including those seeking preventive, maintenance or strengthening services, improve consistency in service delivery and enhance treatment outcomes, thereby supporting recurring customer demand for our services. Our trained therapists provide both symptomatic relief and address root causes of pain and health conditions, reducing recurrence and helping customers regain vitality.

For further details regarding the treatment backgrounds, please refer to the section headed "Business – Our Services and Products" below.

We believe our continuous development of treatment methodologies, service protocols and technology-assisted applications demonstrates our commitment to learning from evolving customer demand and operating experience, pursuing innovation and technological advancement, strengthening our service delivery model, and developing more systematic, technology-enabled and forward-looking pain management solutions. Going forward, we will continue to monitor technological developments, observe customers' evolving needs and identify opportunities to adopt suitable technologies to further enhance our treatment protocols, technical capabilities and customer experience.

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Integration of Traditional Chinese Medicine Theory with Energy-Based Technologies

We have developed a comprehensive pain management approach that integrates the holistic principles of TCM theory with modern energy-based treatment devices. This distinguishes us from pure Western physiotherapy clinics, localised chiropractic clinics, and traditional TCM bone-setting (跌打) shops in Hong Kong. For further details regarding our pain management and function enhancement services, please refer to the section headed “Business – Our Services and Products – Pain management and function enhancement services”.

By focusing our business on the integration of TCM’s systemic perspective with targeted energy-based technologies (such as electromagnetic, radiofrequency and ultrasound therapies), we are able to deliver more comprehensive, holistic and effective treatment outcomes compared to providers who rely solely on TCM or energy-based device therapies, differentiating our brand from other competitors in the market. We believe this synergistic model represents a key competitive advantage as it requires deep expertise in TCM as well as substantial experience in applying energy-based devices.

Diversified treatment portfolio supporting standardised and individualised service delivery

We have a diversified portfolio of treatment applications, which enables us to offer customers a wide range of therapy options within a consistent treatment framework. Rather than relying on a single treatment modality, we provide a selection of technology-assisted and therapist-administered treatments that may be applied individually or in combination, depending on each customer’s pain points, physical condition, treatment history and functional enhancement objectives.

Our treatments involve a range of technologies and techniques, including electromagnetic field, radiofrequency, infrared and ultrasound. We believe this diversity allows us to address a broad spectrum of customer needs, including muscle tightness, improving sleep quality, pain relief, weight management, circulation-related wellness needs and function enhancement. For further details regarding our treatments, please refer to the section headed “Business – Our Services and Products – Pain management and function enhancement services”.

High customer satisfaction and extensive customer testimonials reinforcing our service quality

We believe customer satisfaction is a key indicator of the quality of our service delivery and an important competitive strength of our Group. Our business model relies not only on our treatment methodology, but also on the ability of our frontline staff to understand each customer’s pain points, and recommend suitable therapy proposals and provide consistent follow-up throughout the course of treatment.

Internal customer satisfaction surveys conducted since FY2025, with approximately 1,900 respondents each year, showed that overall customer satisfaction remained consistently high at approximately 90%, while over 70% of respondents reported pain relief or symptom reduction after the therapy.

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In addition to our internal customer survey, we have accumulated a substantial number of customer testimonials and thank-you letters, particularly regarding the support provided by our frontline staff including their efforts in understanding their physical conditions, explaining treatment procedures, and arranging suitable treatments. These testimonials are documented on our Company's website and displayed at our service centres. These testimonials cover customers from diverse backgrounds, including healthcare workers, teachers, engineers, homemakers and retirees, and reported improvement in their daily activities such as walking, climbing stairs, sleeping, exercising and performing household tasks after receiving our treatments. We believe these testimonials reflect the breadth of our customer base and support our reputation as a customer-oriented pain management and function enhancement services provider.

We believe this customer-centric service approach enhances customer trust, supports treatment continuity and contributes to repeat visits and referrals.

Experienced and well-trained frontline staff supporting consistent and customer-oriented service delivery

Since the establishment of our business in 2007, we have accumulated practical experience and technical know-how in customer assessment, therapist-administered techniques, treatment planning, device operation, staff training and service standardisation. We believe our ability to deliver consistent, professional and customer-oriented services through our frontline staff is a key competitive strength of our Group.

Our Chinese Medicine Practitioners, Advanced Functional Enhancement Advisors, trained therapists, nutritionist and health advisors support the customer service process from reception and consultation to treatment delivery, follow-up and feedback collection. As of 31 July 2026, we had 8 full-time Chinese Medicine Practitioners, 4 Advanced Functional Enhancement Advisors, 102 trained therapists and 1 nutritionist. All of our trained therapists are required to complete mandatory internal training courses upon joining our Group and will receive ongoing training during the course of their employment. All Chinese Medicine Practitioners and Advanced Functional Enhancement Advisors are registered professionals in Hong Kong. For further details regarding our frontline team and staff training, please refer to section "Business – Employees – Training" below.

Our frontline staff has accumulated experience from serving a broad customer base. In aggregate, our trained therapists performed over 364,000 treatment sessions during the Track Record Period. We believe the experience accumulated by our frontline staff from serving a substantial number of customers, together with our structured training system and quality control procedures, enables us to understand each customer's condition, recommend suitable therapy proposals and provide consistent follow-up throughout the course of treatment.

Senior management team with industry experience and strong execution capabilities

Our senior management team is experienced in the pain management market. Mr. Mo has received various business recognitions in Hong Kong. In 2022, he was granted the Fellowship of Innovation and Technology and the Fellowship of Life Science by the Global Academy of Innovative Enterprises. Ms. Cheung is a certified health manager and received various certifications internationally.

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The capabilities of our senior management team are complemented by Mr. Yeung, our Chief Financial Officer. We believe his experience in financial management, listed company operations and the health services industry contributes to our financial reporting, internal control and corporate governance functions. For further details of the qualifications and experience of our Directors and senior management, please refer to the section headed “Directors and Senior Management” in this document.

We believe the backgrounds, practical experience and strategic direction of our senior management team have contributed significantly to our development. We also consider that our founders’ direct industry experience and continued emphasis on treatment innovation and quality provide an important foundation for our operations.

Large-Scale Service Centres in Accessible Hong Kong Locations

We operate large-scale service centres in Hong Kong, each centre having an approximate floor area of 18,000 sq. ft. Our service centres are located in Causeway Bay, Tsim Sha Tsui and Sha Tin, which we believe are highly populated districts with strong accessibility. We believe this positioning supports our ability to attract customers in the mid to high-income segment, which is our target customer base. For details of our service centres, please refer to “Business – Our Service Centres” in this document.

OUR STRATEGIES

Driving organic growth by expanding our customer base and service centre network in Hong Kong

Our strategy to expand our customer base and enhance brand awareness comprises: (i) continuing to deliver a range of treatments and products; (ii) enhancing our marketing efforts across both online and offline channels; (iii) expanding our pain management and function enhancement service capacities; and (iv) further developing our spokesperson strategy by identifying high-profile individuals who appeal to our various customer segments.

In February 2025, we rented a new service centre in Causeway Bay. The new centre has a size of 17,130 sq. ft., which is comparable in size to our Sha Tin Service Centre (17,938 sq. ft.).

Enhancing customer experience and treatment quality through centralised management

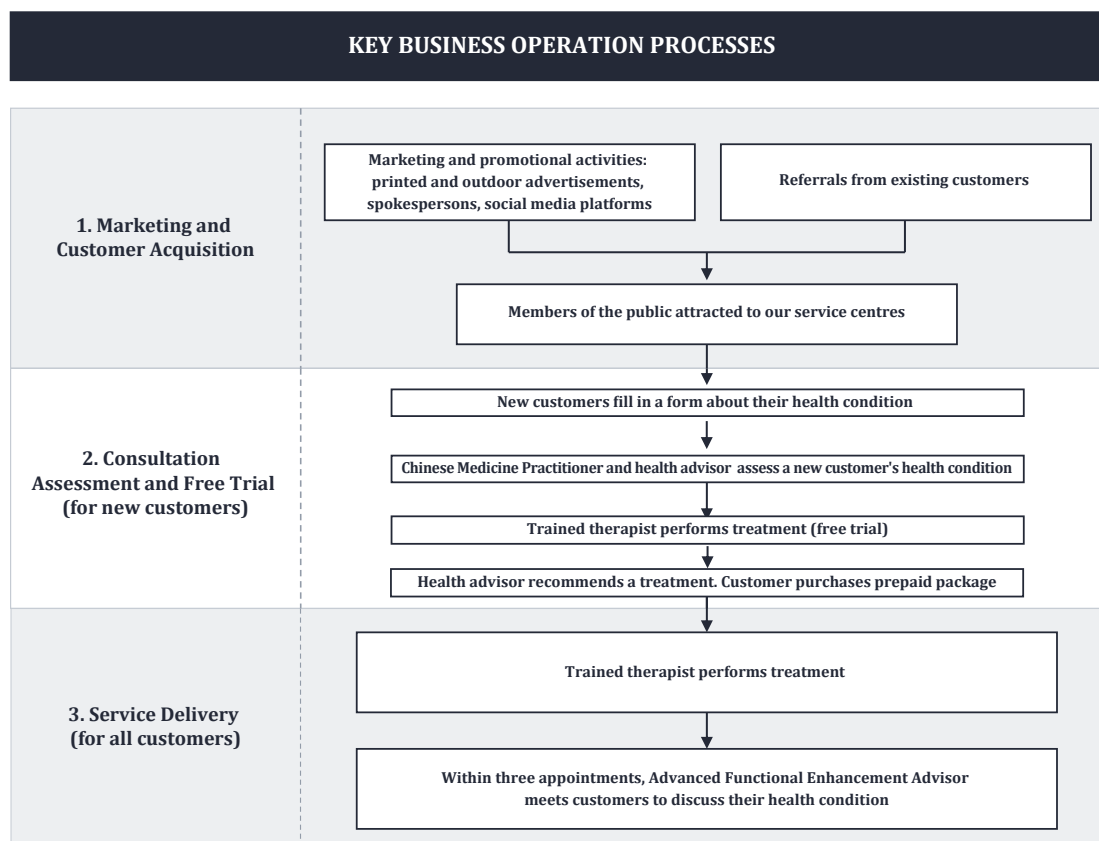
We intend to enhance customer experience and strengthen the consistency and quality control of our treatment services by introducing a centralised management platform for all of our treatment devices. The platform is expected to enable us to standardise, record and monitor treatment parameters, including the energy levels applied during treatment sessions, and facilitate management review of relevant treatment data.

Going forward, we plan to progressively integrate the platform into our service delivery process. We believe the platform will facilitate the timely identification and follow-up of deviations from prescribed treatment parameters, and support the continuous review and enhancement of our treatment protocols and service quality. These initiatives are expected to improve the consistency and reliability of our treatment services and enhance the overall customer experience. Please refer to the section headed “Future Plans and Use of [REDACTED] – Use of [REDACTED]” in this document for details.

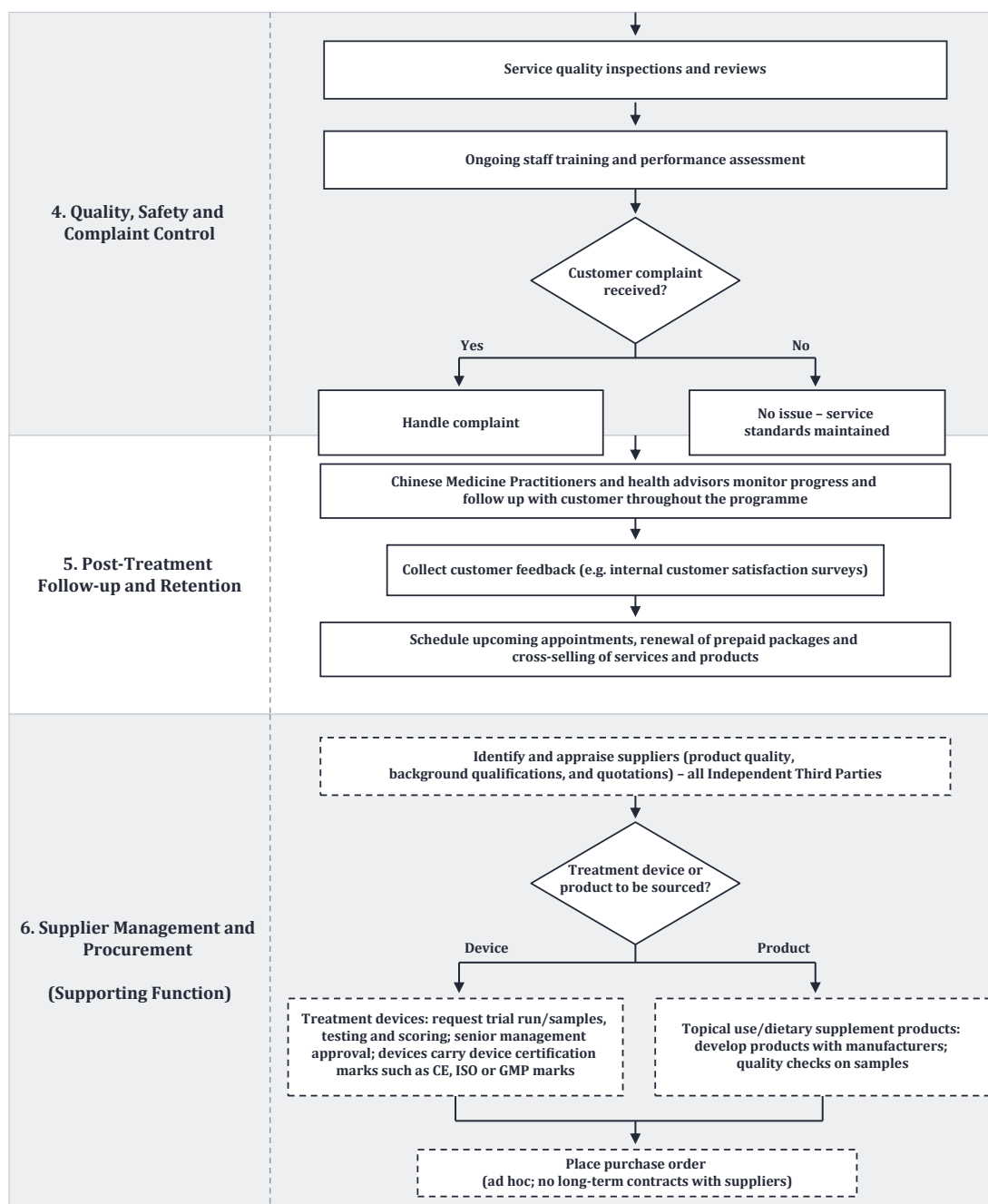
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BUSINESS MODEL

The flow chart below shows our business model.



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OUR SERVICES AND PRODUCTS

Pain management and function enhancement services

Pain management and function enhancement services have been our dominant business, accounting for approximately 85.7%, 84.5% and 84.1% of our revenue for FY2024, FY2025 and FY2026 respectively.

The theoretical basis of our pain management and function enhancement services is our “RDS+” (Restore, Detox, and Strengthen) approach, which is inspired by the concept of the meridian system (經絡) of Traditional Chinese Medicine. According to Traditional Chinese Medicine theory, the stagnation, blockage or deficiency in the flow of Qi (氣) and blood are the root causes of pain and illness. Our RDS+ approach combines Traditional Chinese Medicine concepts with various energy-based treatment devices sourced internationally, with the aim of restoring, detoxing and strengthening the flow of Qi, and of easing and eliminating acute and chronic musculoskeletal and nociceptive pain (such as back, neck, limb, joint, thoracic and trunk pain conditions), alleviating muscle fatigue, relieving muscle stiffness, removing stagnation, detoxing metabolic wastes, improving blood circulation, strengthening muscle and joints, and enhancing body functionality.

All of our pain management and function enhancement treatments are non-invasive, non-pharmacological and non-surgical in nature. We use various energy-based devices sourced from Germany, the Republic of Korea and Japan, together with procedures and manual therapy operated and performed by our trained therapists, to provide each customer with a treatment solution tailored to their individual needs. Our treatments focus not only on pain relief but also on strengthening, maintenance and overall improvement of bodily function.

Our Chinese Medicine Practitioners and health advisors recommend suitable therapies to our customers based on their conditions, and monitor and follow up with each customer throughout the programme.

We encourage customers to visit our service centres regularly, and undergo two to three treatment sessions per visit. We limit the number of treatment sessions per visit for health reasons.

As at 31 July 2026, we had 8 full-time Chinese Medicine Practitioners, 4 Advanced Functional Enhancement Advisors, 102 trained therapists and 1 nutritionist. Depending on the conditions of our customers and the progress of their treatment, we recommend suitable treatments using different energy-based treatment devices, which apply different methods (such as electromagnetic, radiofrequency and ultrasound therapies) to achieve different targeted results, coupled with the use of different manual therapy techniques.

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Our Key Treatments

Treatment/Treatment device used	Description	Expected effects	Original price per time as at the Latest Practicable Date
Relieve Master	The device emits low-intensity ultrasound and micro-vibrations, which conduct thermal energy into the tissue to promote local blood circulation and relieve muscle discomfort.	It provides a relaxing vibrating massage, helping to loosen tense muscles and alleviate pain.	HK\$1,800
Dr. Strengthen	This treatment utilises High Energy Inductive Therapy (HEIT), designed to stimulate the body through pulsed electromagnetic fields. To address customer needs, this treatment offers both a targeted strengthening mode and a dynamic enhancement mode.	It relieves pain; strengthens muscles to protect joints and promote bone and cartilage health, whilst aiding the body's recovery.	HK\$1,800
Health Star	This treatment utilises microcurrent technology, with low-frequency energy penetrating the muscles to target areas of pain.	It eases fatigue and improve sleep quality. This treatment synergises with ANKH's meridian and acupoint therapy techniques, promoting blood and lymphatic circulation throughout the body and aiding detoxification.	HK\$2,100

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Treatment/Treatment device used	Description	Expected effects	Original price per time as at the Latest Practicable Date
Dr. Energy	The treatment integrates the three core elements of deep heat therapy: Capacitive Energy Transfer (CET), Resistive Electrical Transfer (RET), and instrument assisted soft tissue mobilisation (IASTM) tool therapies. CET directs radiofrequency energy into the muscles to generate heat; whilst; RET concentrates radiofrequency energy on the target area and combines this with the use of specialised instruments for therapy.	It relaxes tense muscles and soft tissues; improves joint flexibility; and relieves pain.	HK\$1,900
Ultra Detox	The treatment combines thermotherapy with vacuum suction technology to induce localised warming and a deep heat sensation.	It promotes blood circulation and unclogs meridians, helping to boost metabolism and aid detoxification, whilst relieving swelling. It also relieves muscle fatigue and soothes pain.	HK\$2,100
Micro Healing	The treatment utilises interferential current and electromyostimulation technology, featuring four operating modes, and is designed to deliver electrical pulses to deep tissues and trigger points.	It helps to relax tense muscles, soothe muscle aches and fatigue in the lower back, shoulders, neck and joints, and helps to accelerate metabolism.	HK\$1,300

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Treatment/Treatment device used	Description	Expected effects	Original price per time as at the Latest Practicable Date
Power Wellness	The probe emits far-infrared energy, which, when combined with the application of ANKH Power Oil, promotes absorption.	By unblocking the body's meridians, it improves the circulation of Qi and blood, and strengthens the body.	HK\$2,800
Super Strong	The non-invasive high-intensity electromagnetic fields penetrate the muscular layer, causing contractions of large muscles intensively. The device comes pre-programmed with multiple therapy modes tailored to different treatment areas.	It stimulates muscle contraction to strengthen muscles, tendons and ligaments, and promotes joint flexibility and stability.	HK\$3,800
Elite Health Pro	The treatment combines dual-frequency ultrasound and high-intensity focused ultrasound technology to deliver thermal energy to the area between the fascia and the fat layer for therapeutic purposes.	It promotes skin tightening and muscle relaxation, helping to reduce the thickness of subcutaneous fat; weight loss consequently eases the strain on the joints; it also aids collagen production, improves tissue elasticity and promotes the body's recovery.	HK\$15,000

There was no material fluctuation in treatments required and price during the Track Record Period. Our business is not subject to seasonality. We set the price of treatments by considering market price of similar treatments, the type of device, manpower and consumables required.

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Our Professionals

Chinese Medicine Practitioners

As at 31 July 2026, we had 8 full-time Chinese Medicine Practitioners.

Our Chinese Medicine Practitioners are responsible for conducting initial consultations to identify customers' pain points, understanding the customers' needs and health conditions, and understanding the root causes of their conditions from a holistic TCM perspective. They sometimes monitor treatments. Our Chinese Medicine Practitioners are a free add-on feature of our treatments. This ensures that each customer receives a tailored treatment plan aimed at achieving optimal pain relief and wellness outcomes.

The following lists out the details of our Chinese Medicine Practitioners:

Chinese Medicine Practitioner	Year of Registration as a Chinese Medicine Practitioner	Year of joining our Group
CMP A	2017	2024
CMP B	2020	2021
CMP C	2020	2025
CMP D	2020	2022
CMP E	2021	2024
CMP F	2024	2025
CMP G	2022	2024
CMP H	2019	2024

Trained therapists

As at 31 July 2026, we had 102 trained therapists. Our trained therapists are responsible for delivering the treatment sessions to our customers through operating our energy-based devices. In order to ensure the quality of our treatment services and customer satisfaction, all our trained therapists undergo comprehensive training on the use of our energy-based devices and are assessed on their competence to ensure consistent service quality across our service centres. For details on the training received by our trained therapists, please refer to the section headed "Business – Employees – Training" of this document.

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Advanced Functional Enhancement Advisor

As at 31 July 2026, we had 4 Advanced Functional Enhancement Advisors. They are responsible for assessing customers' physical health, mobility, and functional condition to identify any movement-related issues and advising customers on how to improve their mobility. They will monitor customers' progress through follow-up assessments, observing their posture, balance, walking pattern, and range of motion, and guide them through appropriate movements or exercises. They will evaluate whether the customer's condition has improved, adjust the treatment plan as necessary, and provide advice to support recovery and improve mobility. Our Advanced Functional Enhancement Advisors are a free add-on feature of our treatments.

Advanced Functional Enhancement Advisor	Relevant qualifications	Year of qualification	Year of joining our Group
Advanced Functional Enhancement Advisor A	Registered Part Ib Physiotherapist	2022	2025
Advanced Functional Enhancement Advisor B	Registered Part Ib Physiotherapist	2021	2024
Advanced Functional Enhancement Advisor C	Registered Part Ib Physiotherapist	2025	2025
Advanced Functional Enhancement Advisor D	Registered Part Ia Physiotherapist	2024	2024

Our Chinese Medicine Practitioners and Advanced Functional Enhancement Advisors are required to adhere to their professional codes of conduct throughout the period of their practice. We have obtained certificates of standing in respect of our Chinese Medicine Practitioners and Advanced Functional Enhancement Advisors issued by the Chinese Medicine Council and the Physiotherapists Board certifying that they have not been found guilty of professional misconduct and no disciplinary proceedings against them were in process.

Our Chinese Medicine Practitioners and Advanced Functional Enhancement Advisors maintain professional malpractice liability insurance, which includes indemnity, advice and legal representation in relation to claims, investigations and proceedings arising from or in connection with their professional practices. For details, please refer to the section headed "Business – Insurance".

Nutritionist

As at 31 July 2026, we had 1 nutritionist. Our nutritionist is principally responsible for providing customers with general dietary and wellness guidance to help customers building up muscle, including suggestions on food choices, eating habits and the maintenance of a balanced diet. He may also respond to customers' general enquiries regarding nutrition and provide practical dietary suggestions based on their individual preferences and general wellness needs. Our nutritionist is a free add-on feature of our treatments.

For details of recruitment and staff training, please refer to the section headed "Business – Employees".

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Topical use and dietary supplement products

To complement our services, we sell over-the-counter topical use products, including creams, moisturisers and ointments, as well as dietary supplement products, at our service centres and through the online shop on our website. Revenue from the sale of our topical use and dietary supplement products accounted for approximately 0.1%, 0.1% and 0.1%, of our total revenue for FY2024, FY2025 and FY2026 respectively. For details about our suppliers, please refer to the section headed “Business – Suppliers, Procurement and Inventory Management”. Customers can return products due to damage or defect within seven days from the date of purchase. All products can be exchanged once only. During the Track Record Period, we had not been subject to any material product liability claim nor did we have any material product return or product recall. There is no product life cycle or seasonality. We set the price of products based on comparison with similar products in the market and our market position. We do not foresee material change in the price of our products.

1. 30s Ice and Warm Rescue



Product type:

A set of two roll-on ointments

Intended effects/Target audience:

Instant relief for muscle tendons joint pain discomfort, sprains and strains, injury prevention before exercise, relief after exercise, redness, swelling, burning discomfort.

Original price as at the Latest Practicable Date:

HK\$676

2. 40+ Knee Expert



Product type:

A supplement

Intended effects/Target audience:

It is suitable for people aged 40 or above who are suffering from various types of pain, including joint degeneration, sports injuries, occupational strain, neck and shoulder pain, frozen shoulder, lower back pain, elbow pain, finger joint pain, and ankle pain.

Original price as at the Latest Practicable Date:

HK\$599

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3. *ANKH Skin Power*



Product type:

An ointment

Intended effects/Target audience:

To cure dry and sensitive skin and eczema.

Original price as at the Latest Practicable Date:

HK\$680

4. *CHARISMS*



Product type:

An ointment

Intended effects/Target audience:

It improves eczema, rashes, diaper rash, housewife's hand, and sensitive skin problems; it reduces redness and marks, moisturises and repairs damaged skin, and can be used as a daily moisturiser.

Original price as at the Latest Practicable Date:

HK\$280

5. *Super 17 Probiotics*



Product type:

A supplement

Intended effects/Target audience:

It is suitable for people with sensitive intestine, poor digestion, immunodeficiency, eczema and sensitive skin.

Original price as at the Latest Practicable Date:

HK\$499

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OUR SERVICE CENTRES

We provide pain management and function enhancement services through our service centres in Causeway Bay, Tsim Sha Tsui and Sha Tin. In view of high utilisation rate of Causeway Bay Service Centre I and Tsim Sha Tsui Service Centre I, we entered into rental agreements for larger premises in Causeway Bay in February 2025 and in Tsim Sha Tsui in November 2025 for the establishment of Causeway Bay Service Centre II and Tsim Sha Tsui Service Centre II respectively. For details of our properties, please refer to the section headed “Business – Properties” below.

Each Service Centre is equipped with various treatment devices, enabling our trained therapists to provide treatment procedures tailored to the individual needs of each customer. The same types of services and the same types of equipment are provided across all of our Service Centres. We sourced them from treatment device manufacturers, distributors and healthcare companies. The table below summarises the number of treatment rooms and approximate number of treatment devices of our service centres as at the Latest Practicable Date:

	Causeway Bay Service Centre I (ceased operation in June 2025)	Causeway Bay Service Centre II	Tsim Sha Tsui Service Centre I (ceased operation in February 2026)	Tsim Sha Tsui Service Centre II	Sha Tin Service Centre
Number of treatment rooms	17	48	30	60	72
Number of treatment devices (approximate)	89	89	155	155	100

The table below sets out the revenue contribution of our service centres during the Track Record Period.

	FY2024		FY2025		FY2026	
	HK\$'000	%	HK\$'000	%	HK\$'000	%
Tsim Sha Tsui	173,179	54.3	151,948	48.7	155,904	42.4
Causeway Bay	89,154	27.9	93,092	29.9	112,381	30.6
Sha Tin	56,884	17.8	66,852	21.4	99,258	27.0
Total	319,217	100.0	311,892	100.0	367,543	100.0

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The table below sets out the utilisation rate of our service centres during the Track Record Period.

	FY2024			FY2025			FY2026		
	Service capacity	Actual number of treatment sessions	Utilisation rate	Service capacity	Actual number of treatment sessions	Utilisation rate	Service capacity	Actual number of treatment sessions	Utilisation rate
	(Note 1)		(Note 2)	(Note 1)		(Note 2)	(Note 1)		(Note 2)
Tsim Sha Tsui Service Centre I (Note 3)	87,840	70,204	80%	87,600	62,223	71%	74,400	58,044	78%
Tsim Sha Tsui Service Centre II (Note 3)	Nil	Nil	Not available	Nil	Nil	Not available	26,400	9,324	35%
Causeway Bay Service Centre I (Note 4)	49,776	37,415	75%	49,640	36,471	73%	10,744	8,885	83%
Causeway Bay Service Centre II (Note 4)	Nil	Nil	Not available	Nil	Nil	Not available	109,824	34,911	32%
Sha Tin Service Centre	210,816	28,749	14%	210,240	32,730	16%	209,664	48,282	23%
Overall	348,432	136,368	39%	347,480	131,424	38%	431,032	159,446	37%

Notes:

1. The service capacity is presented for illustrative purposes only and represents the estimated maximum number of treatment sessions that can be delivered. It is determined by reference to (i) the number of treatment rooms available at each service centre, (ii) the estimated number of treatment sessions that can be performed per room per day during normal operations based on our experience and standard operating procedures, and (iii) the actual number of days on which the centres were open for business in each respective financial year.
2. Utilisation rate is calculated by dividing the actual number of treatment sessions performed (including the estimated preparation time) by the service capacity.
3. Tsim Sha Tsui Service Centre I operated until February 2026, and Tsim Sha Tsui Service Centre II commenced operations in February 2026.
4. Causeway Bay Service Centre I operated until June 2025, and Causeway Bay Service Centre II commenced operations in June 2025.

We allocate manpower and equipment among our service centres by taking into account factors including their sizes, locations, number of customers, number of prepaid packages sold, and the historical booking records of customers, in order to optimise the utilisation of our resources.

We book two to three visits in advance for each customer. For details of our booking process, please refer to the section headed "Business – Customers – Prepaid Packages" below.

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Below are pictures of our Causeway Bay Service Centre II:

Reception



Resting area



Treatment room



VIP treatment room



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Below are pictures of our Tsim Sha Tsui Service Centre II:

Reception



Resting area



Treatment room



VIP treatment room



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Below are pictures of our Sha Tin Service Centre:

Reception



Resting area



Treatment room



VIP treatment room



OUR DEVICES

As at the Latest Practicable Date, we had approximately 300 treatment devices. For details about our procurement process, please refer to the section headed “Business – Suppliers, Procurement and Inventory Management” in this document.

According to our accounting policy, depreciation of our treatment devices is calculated using the straight line method to allocate their cost to their residual values over an estimated useful life of five years. For details, please refer to “Appendix I – Note 3 Material Accounting Policies – Property, Plant and Equipment” of this document. We do not have a specific replacement cycle for our equipment and we will only replace them when necessary. Replacement decisions are made on a case-by-case basis having regard to the factors such as the operating conditions and cost effectiveness. Our suppliers provide warranty for our devices.

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OUR WEBSITE

The Company maintains a corporate website at <https://www.ankh.com.hk/>, which serves as a key platform for communicating information about the Group to existing and prospective customers as well as other stakeholders. In addition, customers may review the customer testimonials, browse health and pain-related information and specialist blog articles, register for a complimentary trial experience, contact the Group directly and purchase products online.

CUSTOMERS

Our target customers are primarily mid-to-high income individuals. The Group's revenue from any single customers did not contribute 10% or more of the total revenue of the Group for FY2024, FY2025 and FY2026. Our top five customers during the Track Record Period were Independent Third Parties. In FY2024, FY2025, FY2026, approximately 8,700, 10,000 and 11,200 customers redeemed their prepaid packages respectively.

The table below sets out the number of repeat customers who continue to buy further packages upon expiry of the previous prepaid packages:

	FY2024	FY2025	FY2026
Total number of customers who made purchases in the year	4,495	5,599	6,335
Repeat customers	912	974	833
Rate	20%	17%	13%

Prepaid Packages

Our customers generally purchase prepaid packages for our pain management and function enhancement services. Customers may pay the lump sum upfront or by instalment. As described above, we encourage customers to visit our service centres regularly, and undergo two to three treatment sessions per visit. Generally, each customer will attend treatment sessions at one service centre only. As seen from the utilisation rate of our service centres in the section headed "Business – Our Service Centres" above, we have sufficient capacity to meet customers' needs. The validity period of prepaid packages is generally 1 to 2 years. Each invoice states the validity period of the prepaid package. Generally, customers cannot book unused treatment sessions after the validity period. We have discretion to extend the validity period in unforeseen circumstances such as the Covid-19 pandemic.

We pay our health advisors monthly commission for selling prepaid packages. The percentage of commission increases in line with monthly sales amount. We pay them bonus for reaching sales target. We have discretion to change the terms of commission and bonus at any time.

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We have internal control measures to prevent health advisors from selling excessive prepaid packages. Health advisors must comply with our guidelines when selling prepaid packages in order to receive commission. We ask for customers' feedback regularly. If we receive unfavourable feedback, we will discuss with our staff during regular meetings. Our senior management regularly reviews prepaid package sales reports to identify any potential excessive sale and the utilisation percentage of prepaid packages. We assess the health condition of new customers. Our guideline stipulates that we will not sell prepaid package to people with certain health conditions, such as people undergoing cancer treatment.

For FY2024, FY2025 and FY2026, the refund amounts to our customers for their requested refunds were HK\$3.7 million, HK\$2.7 million and HK\$3.9 million, representing 1.4%, 0.9% and 0.9% of our contracted sales in FY2024, FY2025 and FY2026 respectively. If we refund our customers for prepaid packages, we will deduct the relevant health advisors' monthly sales amount accordingly before calculating commission. Refund requests are reviewed and handled on a case-by-case basis and are subject to our senior management's final approval, with the Administrative Department and the Finance Department involved in handling and processing the relevant arrangements and payment. We monitor the status and progress of refund requests. We believe that our low refund levels reflect our service quality, our complaint-handling practices and our commitment to customer satisfaction.

For financial reporting purposes, the prepaid packages are recorded as contract liabilities in the balance sheet at the point of sales and subsequently recognised as revenue in the income statement when the service treatments are delivered to customers. Expired prepaid packages are fully recognised as revenue. For details of our accounting policy regarding prepaid packages, please refer to Appendix I of this document.

We have continuously operated our prepaid package business model for more than 10 years and forfeiture income has been a feature of our business since 2016. Forfeiture income accounted for 14.2%, 15.4% and 15.8% of our total revenue for FY2024, FY2025 and FY2026, respectively. For details, please refer to the section headed "Financial Information – Description of selected items in combined statements of profit or loss – Revenue" and Appendix I in this document.

SUPPLIERS, PROCUREMENT AND INVENTORY MANAGEMENT

Major Service Providers and Suppliers

During the Track Record Period, our service providers principally comprised providers of advertising services and health advisory services. We also procured treatment devices, topical use products, dietary supplement products and related consumables used in our business from other suppliers.

We have not entered into long-term agreements with suppliers and service providers of devices, topical use products, dietary supplement products, and advertising services. Instead, we generally procure goods and services on an as-needed basis by placing purchase orders with suppliers and service providers. This approach enables us to retaining flexibility to select suppliers, adjust order quantities and specifications, and negotiate commercial terms to align with our operational needs.

BUSINESS

We have not experienced any significant issues or disputes with our suppliers and service providers, nor have we experienced any material fluctuations in purchase prices or material shortage when procuring from our suppliers and service providers during the Track Record Period and up to the Latest Practicable Date.

Below is a description of our procurement procedure for treatment devices, topical use products and dietary supplement products, advertising services and external health advisor services.

1) Treatment devices, topical use products and dietary supplement products

When we first identify a need to purchase or introduce new treatment devices, the procurement team will be notified. The procurement team will then conduct research and collect information on different types of treatment devices from the respective suppliers and distributors, including but not limited to their price, functions, certifications, and place of origin. Where appropriate, we may also request trial runs for internal testing and assessment after obtaining senior management's approval.

We evaluate the proposed device based on functionality, safety, certifications, after-sales service, cost-effectiveness, supplier reliability and compatibility with our business model. The procurement recommendation and supporting documents are then submitted to our senior management.

Our senior management are responsible for the final decision on whether to purchase or introduce a new treatment device. Upon approval by our senior management, we will negotiate with the supplier and place the relevant purchase order. Inspection, assessment and checking procedures are required before the relevant treatment devices are put into use by us.

Our procurement of topical use products and dietary supplement products generally involves selecting suitable suppliers and product manufacturers based on criteria including product quality, background qualifications, and quotations. Upon approval by our senior management and before formal production or batch procurement, product samples are required to be inspected for appearance, packaging, labelling, ingredient or formulation information, and arranging for testing or certification documents. Where required, we also arrange packaging and printing services, including bottling, labeling, printing and packing arrangements.

(2) Advertising services

Our Marketing Department is responsible for designing our marketing campaigns, and identifying suitable vendors offering the required services. The proposed campaigns are then presented to our senior management for review and approval. Our Marketing Department staff will then liaise with the service providers to confirm the order, or create accounts on online advertising platforms to place and manage advertisements. We assess service providers based on their service scope, track record, historical performance, and prices. For details, please refer to the section headed "Business – Marketing and Promotion".

BUSINESS

(3) *External health advisor services*

We engage external health advisors. For further details, please refer to the sections headed “Business – Customers – Prepaid Packages”.

The key terms of the external health advisor contract are as follows:

Key term	Summary
Scope of services	Enhancing individual and corporate performance, providing quality services to customers
Duration	Remain in force until terminated by either party.
Termination	Either party may terminate the agreement by written notice or payment in lieu of notice. The Company may terminate the agreement in the event of a significant breach by the health advisor
Remuneration	Monthly fee plus commission based on sales amount. We may adjust the percentage of commission

There were no material breaches of the agreements during the Track Record Period and up to the Latest Practicable Date.

We select external health advisors in accordance with our internal evaluation and approval procedures. Some external health advisors were former therapists, while others were engaged through referrals from our staff. The selection process consists of an interview and final review and approval by our executive Directors. In selecting external health advisors, we consider factors including their prior sales experience, sales ability and professional ethics.

BUSINESS

The following table sets forth the basic information of our top five service providers and suppliers during the Track Record Period:

FY2024

Service provider	Principal business	Principal business location	Service	Year of commencing business relationship	Credit term	Payment method	Payment amount (HK\$'000)	Percentage*
A	Web search and online advertising	Singapore	Advertisement	2020	Monthly	Credit card	20,880	38.9%
B	Online advertising and social media platform	Ireland	Advertisement	2020	Instant direct debit	Credit card	6,997	13.0%
C	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	6,155	11.5%
D	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	5,049	9.4%
E	Health advisor	Hong Kong	Health advisor	2023	Monthly	Cheque	3,572	6.7%

* *Percentage of advertising and marketing expenses and manpower service expenses*

FY2025

Service provider	Principal business	Principal business location	Service	Year of commencing business relationship	Credit term	Payment method	Payment amount (HK\$'000)	Percentage*
B	Online advertising and social media platform	Ireland	Advertisement	2020	Instant direct debit	Credit card	14,369	24.2%
A	Web search and online advertising	Singapore	Advertisement	2020	Monthly	Credit card	13,583	22.9%
C	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	7,379	12.4%
D	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	5,574	9.4%
F	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	3,152	5.3%

* *Percentage of advertising and marketing expenses and manpower service expenses*

BUSINESS

FY2026

Service provider	Principal business	Principal business location	Service	Year of commencing business relationship	Credit term	Payment method	Payment amount (HK\$'000)	Percentage*
B	Online advertising and social media platform	Ireland	Advertisement	2020	Instant direct debit	Credit card	27,861	33.8%
A	Web search and online advertising	Singapore	Advertisement	2020	Monthly	Cheque	14,622	17.7%
C	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	9,730	11.8%
D	Health advisor	Hong Kong	Health advisor	2022	Monthly	Cheque	7,062	8.6%
G	Health advisor	Hong Kong	Health advisor	2025	Monthly	Cheque	3,242	3.9%

* Percentage of advertising and marketing expenses and manpower service expenses

To the best knowledge and belief of our Directors, all of our top five largest service providers and suppliers during the Track Record Period were Independent Third Parties and none of our Directors, their respective close associates, or any Shareholder who owns more than 5% of our issued share capital had any interest in any of our top five largest service providers and suppliers during the Track Record Period.

Inventory Management

Our inventory mainly comprises of our consumables, topical use products and dietary supplement products. Upon delivery, we inspect the item name, quantity, specifications, batch number, expiry date and packaging condition before accepting and recording the inventories in our inventory ledger. We monitor the level of our stock and conduct stock-takes regularly to minimise storage time while ensuring sufficient inventory is maintained to support our operations and customer demand. Replenishment decisions are made with reference to business needs, historical sales or consumption, existing inventory levels and expiry dates. We also record and monitor the expiry dates of our products closely as part of our inventory management procedures.

MARKETING AND PROMOTION

We provide pain management and function enhancement treatments directly to customers at our service centres, and sell topical use products and dietary supplement products directly to customers at our service centres and through our own online store.

We place significant emphasis on marketing and promotion to maintain brand visibility, driving customer acquisition, retaining existing customers and increasing customer spending. Marketing and promotional activities are overseen by the Group's marketing department under the direction of senior management and are adjusted from time to time in response to market conditions and business needs.

BUSINESS

(1) Offline Marketing

The Group conducts offline marketing primarily to maintain and enhance brand awareness and market recognition in Hong Kong. Offline marketing initiatives include advertising at/on tunnel billboards, public transport stations, taxis, as well as other outdoor media placements. The Group may from time to time enter into booking arrangements with outdoor media service providers to display advertisements at specified locations and periods. The Group also participates in promotional and charitable events.

(2) Online Marketing

We utilise online and social media platforms to promote our services and enhance our brand presence. Our online marketing initiatives include (i) advertisements on major online search engines, television programmes, online press and social media platforms, and (ii) maintaining and operating our official social media accounts for ongoing brand communication and customer interaction through regular content postings. The content disseminated through these channels primarily focuses on (a) customer recognition and testimonials, (b) spokesperson-led promotional materials, and (c) communications relating to the Group's treatments and service features, as well as other brand-building and service-related updates.

(3) Spokespersons

We also engage spokespersons directly or through their agencies to participate in our advertising and promotional activities. Based on our spokesperson arrangements, the scope of services typically includes (i) production of advertising materials (including television commercial, promotional/treatment video and photos) and (ii) the publication of social media posts on the spokesperson's official social media accounts. Under our spokesperson arrangements, we have the right to produce, release and distribute advertising materials featuring the spokesperson in Hong Kong across specified media channels, which may include television, online platforms (including our official websites and social media accounts), and offline print and outdoor media.

(4) Promotion and Discount

We offer free trials to new customers. We also offer one-off discounts on treatment to new customers if they purchase treatment packages after free trial. We may also offer free treatment sessions to customers who purchase treatment sessions in bulk.

BUSINESS

QUALITY CONTROL, SAFETY AND COMPLAINT MANAGEMENT

We have established a comprehensive quality control system covering, among other things, (i) staff training and assessment to maintain service quality and safety standards, and (ii) certification and quality assurance system for our treatment devices, topical use products and dietary supplement products.

(1) Staff Training

We believe that well-trained frontline staff are one of our strongest assets. In order to ensure the service quality and competence of our frontline staff, we have implemented mandatory training programmes that cover all aspects of our workflow with the aim of ensuring our frontline staff is equipped with the necessary skills and knowledge to serve our customers. Our staff will also undergo regular assessments to ensure they retain their skills and knowledge covered in their training. We also employ standardised workflow protocol for our trained therapists. For details on our staff training, please refer to the sections headed “Business – Employees – Training” and “Business – Employees – Ongoing Oversight and Quality Assurance”. Our staff also receive training on customer safety procedures, including health screening, and treatment suitability assessment. For details, please refer to the section headed “Business – Health and Work Safety – Customer Safety.”

Our staff are also required to respond to customers’ feedback in a timely manner to identify potential issues and review the quality and safety of our treatments and products. For details, please refer to the section headed “Business – Quality Control, Safety and Complaint Management – Customer Feedback and Complaint Handling.”

(2) Product and Device Safety

We place great emphasis on the quality and safety of our treatment devices and products. As part of our quality control, we procure treatment devices that bear recognised certification marks and/or are manufactured under recognised quality management standards. The certifications associated with our treatment devices include CE marking, ISO 13485, Korea Certification (KC), Korean Food and Drug Administration (KFDA) certification and GMP, and certain devices have also been tested or verified by independent organisations such as SGS and Intertek. Our topical use and dietary supplement products have also been tested and/or certified by independent testing organisations, including SGS and STC, for specified parameters such as heavy metals, toxic elements, microbiological content and the presence of certain prohibited substances.

Customer Feedback and Complaint Handling

We regard customer feedback as an important tool for continuously improving our services, enhancing the customer experience and maintaining high service standards. We take customer feedback seriously and handle comments, suggestions and complaints in a timely, fair and professional manner.

BUSINESS

Customer feedback

Upon completion of a treatment session, we will invite customers (including new and repeat customers) to complete an on-site satisfaction questionnaire to track customer satisfaction and obtain feedback on their overall experience. Where a customer provides comments or raises concerns in the questionnaire, our frontline staff and Operations Department will follow up, with the aim of addressing the customer's concerns in a timely manner by listening to and recording the customer's specific concerns and requests. We also receive feedback and complaints through instant messaging channels and telephone.

Satisfied customers may provide handwritten thank-you letters and other positive feedback. We may also invite satisfied customers to provide video testimonials regarding their experience. We review such feedback and testimonials to identify the aspects of our services that customers value the most, which assists us in maintaining our service strengths and identifying areas for continuous improvement.

Complaint handling procedure

We have adopted internal procedures for handling complaints:

- **First stage:** The health advisor, customer service staff or Operations Department will contact the customer as soon as practicable to listen proactively, clarify the issues raised and identify the reasons behind. Our staff will, where appropriate, offer an apology, provide further explanations and arrange subsequent treatments proactively. If the customer's dissatisfaction cannot be effectively addressed at this stage, the matter will be escalated to the second stage.
- **Second stage:** A supervisor will contact the customer and, having regard to the customer's core concerns, coordinate with relevant departments and propose specific resolution options including a change in therapists or service centres.
- **Third stage:** Where a complaint is resolved, the Operations Department and customer service staff will conduct an internal review of the case, investigate any deficiencies in the relevant service processes, and implement process enhancements and staff training where appropriate. The Operations Department is required to summarise the case and report internally as part of continuous improvement.

During FY2024, FY2025 and FY2026, we received nine, one and five unfavourable feedbacks. Common reasons for our unfavourable feedbacks are difference between customers' expectations and the actual timeframe or results delivered. All unfavourable feedbacks during the Track Record Period have been settled or resolved.

BUSINESS

INFORMATION TECHNOLOGY

Our Group has a comprehensive information technology system to support our overall business operations so as to deliver service across our therapeutic treatments and retail channels.

Our business operations, including maintaining customer records, billing and recording daily revenue, are highly dependent on the continuous operation of our information technology systems. As at 31 July 2026, our IT Department comprised 11 full-time employees.

POS and Booking Systems

Our information technology infrastructure is anchored by a Point-of-Sale (POS) and booking systems. Our POS and booking systems connect the terminals at each Service Centre to our centralised customer databases, enabling us to record, consolidate and track transactional and operational data relating to treatment packages.

Customer Records

The POS system maintains a comprehensive and secure customer records. Each customer has a unified digital profile that consolidates personal information, treatment history and payment records. Our POS system tracks all customer package details, including descriptions, validity periods, number of unused treatment sessions and payment history. Each time a customer attends a treatment session, we will record in the POS system the name of the attending trained therapist, the number of treatment sessions used, and the date and time of providing the service.

This empowers our Group to analyse customer purchasing behaviour, treatment outcomes, market trends, and operational efficiency. Our senior management can therefore formulate and adjust our business strategies promptly and make data-driven decisions on targeted marketing campaigns.

Operational Capabilities

The booking system records the availability of each trained therapist, recording their daily schedule in blocks of time where they are required to perform a treatment. The booking system will record the trained therapist to carry out the treatment on the day, the room that was booked for the treatment, the health advisor in charge of the relevant customer, the check-in and check-out times and the customer's review of the treatment performed. There is also a record showing the number of customers who have not showed up for treatment on the day, allowing us to remind the relevant customer of their booking when necessary.

BUSINESS

Billing and Payment Processing

The POS system also features a billing and payment processing module. It automatically calculates charges based on the specific treatment services rendered. The system then records the treatment price, applies applicable package discounts, and finally generates an invoice. The system tracks usage of each treatment package, deducts treatment sessions upon service completion which enables our staff to monitor package utilisation and facilitate timely renewal discussions prior to exhaustion. Multiple payment methods are supported, including cash, credit cards, and digital payment platforms, with all transactions securely processed. Receipts and invoices are automatically generated immediately after each transaction.

System Maintenance

In order to ensure that it can continue to meet our operational demands, we regularly maintain, upgrade and enhance our IT capabilities. We follow a structured, risk-based approach covering routine maintenance, scheduled upgrades, and strategic enhancements for our workstations and centralised servers.

To mitigate risks such as power disruptions and network failures, our primary servers are hosted in dedicated data centers with backup generators to ensure continuous uptime. To mitigate risks of cyber threats, we have implemented centralised network firewalls to neutralise malicious activity. This approach ensures the continuity of our customer services, guards against operational interruptions, and maintains the records of our customers properly. Through the ongoing improvement of our information technology system, we ensure a highly secure and resilient digital environment that safeguards our business operations.

DATA SECURITY

In the ordinary course of our business, we collect and handle personal and health-related information of our customers in connection with the provision of our pain management and function enhancement services.

We manage the entire lifecycle of customer data through systematic controls designed to adhere to the core data protection principles under the PDPO and have adopted a personal data and privacy information management policy accordingly:

- **Collection and Consent:** Customers' personal and health data are collected directly from them during in-person consultations. We provide customers with a personal information collection statement prior to collection, explicitly stating the purposes of data collection and obtaining their express consent. We do not collect personal data beyond what is strictly necessary for prescribing and performing treatments.

BUSINESS

- **Data use and accuracy:** Customers' health records and treatment records may only be used for the purposes notified at the time of collection. Where such data is used for new purposes, such as marketing or analytical purposes, consent from the customer shall be obtained beforehand. We shall ensure the accuracy of key data of our customers such as contact details, service records, payment status and complaint handling results. Where such data is updated, our relevant registers and systems shall be updated in a timely manner.
- **Retention and destruction:** All customers' records are stored in a secure and centralised server equipped with firewall protection. We will establish data retention periods based on operational, legal requirements, ensuring personal data is not kept longer than necessary for its original purpose. Once retention timelines expire without a valid business or legal need, the data will be deleted, anonymised, or securely destroyed.

During the Track Record Period and up to the Latest Practicable Date:

1. the Group had not experienced any material data leaks, security breaches, or unauthorised cyber-attacks resulting in the compromise of our customers' personal or health-related data;
2. the Group had not been subject to any material regulatory investigations, penalties, or enforcement notices issued by the Privacy Commissioner for Personal Data (PCPD) in Hong Kong; and
3. the Group had not received any material complaints from customers regarding the collection, misuse, or leakage of personal data.

COMPETITION

Market Positioning and Major Competitors

According to the Ipsos report, our Group operates in the pain management solution services providers industry in Hong Kong where market participants provide treatment services for individuals suffering from pain conditions. We face competition from a wide range of competitors consisting of public and private healthcare centres, small, independent boutique clinics and local bone-setting shops.

Within this industry, our Group belongs to a specialised sub-group of integrated non-invasive pain management solution service providers, which provides pain management services through entirely drug-free, non-surgical and conservative care. We face intense competition against the market players within this sub-group which consists of pure-play service providers and multi-service providers that cater to pain management, wellness, beauty and medical aesthetics.

For details, please refer to the section headed "Industry Overview" in this document.

BUSINESS

Entry Barriers of the Non-Invasive Pain Management Solution Service Providers Industry

According to the Ipsos Report, new market entrants attempting to penetrate the non-invasive pain management solution service providers industry in Hong Kong face significant entry barriers, including (i) capital, technology and operational requirements, (ii) brand positioning, reputation and patient engagement and (iii) professional qualification requirements. For details, please refer to the section headed "Industry Overview" in this document.

Our Directors believe we have successfully differentiated ourselves from competitors through our competitive strengths set out in the section headed "Business – Our Strengths" in the document.

EMPLOYEES

As at 31 July 2026, we had 255 full-time employees in total. All of our employees are based in Hong Kong. During the Track Record Period, we did not have any labour union. The following table sets forth the number of our employees categorised by function as at the Latest Practicable Date:

Function	Number of Employees
Management	3
Administration	67
Operation Support and Management	8
Customer Service	55
Chinese Medicine Practitioner	8
Nutritionist	1
Advanced Functional Enhancement Advisor	4
Health Advisor ^(Note)	7
Trained Therapist	102
Total	255

Note: The figure does not include external health advisors.

Recruitment

We have established structured workflows for recruitment. We primarily recruit through online channels by posting vacancies on job platforms. Applicants submit their resumes and job applications through these platforms, and our Human Resources Department conducts an initial screening based on relevant experience, job knowledge and qualifications.

Shortlisted candidates are invited for interviews. Final hiring decisions are made based on interview performance and are subject to approval by our executive Directors. This systematic recruitment process enables us to attract and select suitable talent efficiently, thereby supporting our operational needs and service quality.

BUSINESS

Training

We place strong emphasis on staff training and development to maintain high service quality, operational efficiency, and regulatory compliance. To this end, we have employed trainers who specialise in developing and delivering dedicated training programs for our service centre staff.

Therapist Training

Newly joined therapists undergo a mandatory initial training program lasting approximately three to four weeks, covering both theoretical and practical instruction on treatment devices. They must pass assessments for our treatment devices before being assigned to work under supervision. Beyond initial onboarding, therapists receive ongoing training, including instruction on operation and safety precautions for new equipment, as well as specialised sharing sessions led by our Advanced Functional Enhancement Advisor.

Health Advisor Training

Newly joined health advisors complete a five-day initial training program. Although health advisors do not administer treatments, their training curriculum covers treatment theory and practice so they can recommend suitable treatments to customers. The program also equips them with background knowledge regarding industry information.

Ongoing Oversight and Quality Assurance

To maintain a consistent customer experience, we enforce a standardised workflow for trained therapists (covering customer reception and appearance standards) and conduct regular training. We review our service processes and monitor the effectiveness of training through regular departmental meetings with our trainers. During these meetings, the trainers report on the training progress of our therapists and health advisors, provide individual evaluations, and recommend targeted training or retraining where necessary. We believe our robust training system is instrumental in upholding service quality, enhancing employee competency, and supporting sustainable business growth.

Labour Disputes

During the Track Record Period and up to the Latest Practicable Date, we had no material labour disputes.

INSURANCE

We maintain insurance coverage for (i) material damage to the contents and stocks in our shops, (ii) business interruption, (iii) money, (iv) public liability, and (v) statutory employees' compensation for our full time and part time employees as well as (vi) institutional professional indemnity insurance.

We review our insurance policies from time to time for adequacy in the breadth of coverage. Our Directors consider that our insurance coverage is in line with the normal coverage in the industry and is adequate for our operations.

BUSINESS

HEALTH AND WORK SAFETY

Our health and safety management system is overseen by our Operations and Human Resources teams.

Customer Safety

Before receiving any treatment or purchasing any treatment packages, customers are required to complete a health declaration form. This enables us to assess whether the proposed treatment is suitable for their individual conditions. For further details, please refer to section “Business – Customers – Prepaid Packages.”

Our trained therapists perform safety checks on treatment devices before treatment, ensuring that the equipment is in good working condition, energy settings are reset to default levels, and the emergency stop button is functional. We also conduct regular inspections and maintenance of our devices.

Premises and Staff Safety

We have established work protocols to maintain a safe environment at our service centres. These include regular checks for slip hazards, clear fire exits and emergency procedures, and periodic inspections of first-aid kits. To protect our staff, we provide guidelines on the safe handling of heavy objects, as well as specific procedures for outdoor duties and severe weather conditions. In addition, we have developed department-specific health and safety protocols tailored to the particular risks of each functional team. Through these measures, we aim to minimise workplace hazards and ensure the well-being of both our customers and employees.

We will continue to review and enhance our health and safety policies and training programmes as our business expands, to ensure compliance with evolving regulatory requirements and industry best practices.

BUSINESS

PROPERTIES

We operate our service centres on leased premises located in convenient commercial and residential districts in Hong Kong. We do not own any of the properties used in our operations.

The following table sets out the details of the leases as at the Latest Practicable Date:

Purpose	Property location	Approximate floor area (sq. ft.)	Lease term	Monthly rent
Causeway Bay Service Centre I	36/F, Soundwill Plaza, 38 Russell Street, Causeway Bay, Hong Kong	7,156	September 1, 2023 – August 31, 2026	HK\$307,708
Causeway Bay Service Centre II	42/F, Tower 1, Times Square, 1 Matheson Street, Causeway Bay, Hong Kong	17,130	February 17, 2025 – February 16, 2028	HK\$729,738
Sha Tin Service Centre	22/F, Grand Central Plaza, 138 Sha Tin Rural Committee Road, Sha Tin, Hong Kong	17,938	July 4, 2022 – July 3, 2028; lease renewed on July 3, 2025, for a further term of 3 years, from July 3, 2025 to July 3, 2028	HK\$376,698 from July 4, 2025 until July 3, 2026; HK\$394,636 until July 3, 2027; and HK\$412,574 until July 3, 2028
Tsim Sha Tsui Service Centre I	Unit 711, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Hong Kong	2,542	January 16, 2024 – January 15, 2027 ⁽¹⁾	HK\$101,680
	Unit 712, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Hong Kong	2,505	January 16, 2024 – January 15, 2027 ⁽¹⁾	HK\$100,200
	Unit 1907, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Hong Kong	2,567	January 16, 2024 – January 15, 2027 ⁽²⁾	HK\$102,680
Tsim Sha Tsui Service Centre II	12/F, World Commerce Centre, Harbour City, 11 Canton Road, Tsim Sha Tsui, Hong Kong	18,579	October 27, 2025 – October 26, 2028	HK\$650,265
Executive and Administrative Office	Suites 2301-05, 23/F, Tower 5, The Gateway, Harbour City, 15 Canton Road, Tsim Sha Tsui, Hong Kong	11,075	February 15, 2026 – February 14, 2029	HK\$498,375

Notes:

- (1) The service centres located at Unit 711, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Hong Kong and Unit 712, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Hong Kong, will be terminated on 15 September 2026 by mutual agreement between our Group and the landlord.
- (2) The service centre located at Unit 1907, Mira Place Tower A, 132 Nathan Road, Tsim Sha Tsui, Hong Kong, has been early terminated on 30 July 2026 by mutual agreement between our Group and the landlord.

BUSINESS

RISK MANAGEMENT AND INTERNAL CONTROL

Our Directors and senior management are responsible for establishing, maintaining and reviewing the effectiveness of our internal control and risk management systems. These systems are designed to ensure our ongoing compliance with applicable laws, regulations and rules relevant to our business operations and corporate governance, and to prevent the recurrence of any non-compliance incidents. We have adopted the following internal control measures:

- We have established the Audit Committee on [•] with written terms of reference in compliance with Rule 3.21 of the Listing Rules and the Corporate Governance Code set out in Appendix C1 to the Listing Rules. The primary duties of the Audit Committee are to review and approve our Group's financial reporting process and internal control and risk management system.
- we have appointed VBG Capital Limited as our compliance advisor, which will provide advice and guidance to us with respect to compliance with the applicable laws and the Listing Rules, including but not limited to various requirements relating to Directors' duties and internal controls.

In preparation for the [REDACTED], we engaged an independent internal control consultant in 2026 to review our internal control system and provide recommendations for improving our internal control system. The independent internal control consultant has conducted a review on the key systems and internal control procedures of our Group in several major areas, including:

- Entity level controls;
- Financial reporting and disclosure;
- Revenue and receipts;
- Procurement, accounts payable and payment;
- Inventory management, including logistics;
- Fixed assets;
- Cash and treasury management; and
- Trademarks and intellectual property.

The independent internal control consultant provided a number of findings and recommendations, in response to which we have taken remedial actions and have adopted comprehensive policies which set out work processes, standards, clear segregation and delegation of duties, risk management frameworks and principles. The major recommendations that we have adopted include, among others:

BUSINESS

Entity Level Control Policies: policies covering key areas at an entity level, including, conflict of interest, board diversity, directors' training and development, risk assessment and management, corporate governance, personal data and privacy information management policy.

Process Level Control Policies: policies covering key processes relevant to the operations of our business, including financial assets management, insurance management, cash and treasury management, revenue and receipts management, inventory management, intellectual property management and tax management.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE MATTERS

We are committed to fostering sustainable practices, promoting social responsibility and maintaining high standards of corporate governance. We have established an ESG governance framework in accordance with the requirements of Appendix C2 to the Listing Rules, through which ESG considerations are incorporated into its business strategy and operations. Under this framework, we seek to identify, assess and manage ESG-related risks and opportunities, including climate-related risks, and to support our long-term sustainable development.

For details of our corporate governance structure, Board composition, Board diversity policy, Directors' duties and corporate governance practices, please refer to the section headed "Directors and Senior Management".

The disclosures below focus on our governance of environmental, social and governance matters.

Governance Structure

The Board assumes overall responsibility for the formulation and oversight of our ESG strategy, policies, risk management and disclosures. The Board oversees ESG-related risks and opportunities, reviews the alignment of ESG strategy with our business objectives, and monitors our ESG performance and the effectiveness of relevant measures on a regular basis.

To assist the Board in discharging its responsibilities, we have established an ESG working group comprising representatives from relevant functions. The ESG working group is responsible for implementing ESG strategies and policies approved by the Board, identifying and assessing ESG-related risks and opportunities relevant to our operations, monitoring ESG performance indicators and coordinating the preparation of ESG disclosures.

The ESG working group reports to the Board at least annually, and more frequently if any material ESG issues arise, on our ESG performance, progress against ESG-related targets, ESG-related risks and opportunities, and the effectiveness of our ESG management and related measures. Through such reporting and ongoing communication with relevant stakeholders, we seek to enhance our understanding of ESG matters and continuously improve our ESG governance practices.

BUSINESS

ESG Policies

We have established ESG-related policies to guide our management of environmental impacts, employee welfare, operational practices and business conduct. Our ESG-related policies cover, among others, environmental management, climate-related matters, employment and labour practices, occupational health and safety, employee development and training, supply chain management, customer welfare and data protection, product and service responsibility, and ethical business conduct. These policies form an integral part of our ESG framework and set out the principles, responsibilities and expectations for managing ESG matters across its operations.

In particular, the ESG-related policies provide guidance on, among others, (i) the management of environmental impacts and resource usage, including energy consumption, emissions and waste management, (ii) employee-related matters such as employment practices, workplace health and safety, and equal opportunity, (iii) operational practices relating to product and service quality, customer welfare and data protection, and (iv) standards of business conduct, including ethical behaviour and compliance with applicable laws and regulations.

Through the implementation of these policies, we seek to promote responsible business practices, enhance risk awareness and support the consistent management of ESG-related matters across its business operations. The ESG-related policies also provide a basis for identifying and addressing ESG-related risks and opportunities, including climate-related considerations.

We review and update our ESG-related policies from time to time, considering applicable regulatory requirements, business developments and evolving stakeholder expectations.

Process to Identify, Assess and Manage ESG-related Risks

We recognise that effective management of ESG-related risks and opportunities is integral to our sustainable development. ESG and climate-related considerations are incorporated into our overall risk management framework, through which relevant risks and opportunities are identified, assessed and monitored on an ongoing basis.

Given the nature of our operations, the principal ESG-related risks faced by us primarily include, among others:

- i. employee-related risks, including talent attraction and retention, workplace health and safety and employee engagement, which may affect service quality and operational stability; and
- ii. risks relating to service quality, customer welfare and data protection, which may adversely affect customer trust, reputation and business performance.

The ESG working group, under the oversight of the Board, is responsible for identifying and evaluating such ESG-related risks and opportunities with reference to our operations, stakeholder expectations and relevant industry practices. ESG-related factors are considered in our business, operational and, where appropriate, financial decision-making processes.

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To support the management of ESG-related risks, we monitor relevant ESG performance indicators and progress against our sustainability objectives. Such indicators include, among others, those relating to greenhouse gas emissions, energy consumption, water usage, employee-related metrics and service quality and compliance measures. These indicators enable us to track our ESG performance, identify potential areas of risk and implement appropriate measures as necessary.

We will continue to enhance our ESG risk identification, assessment and management processes over time, considering business development, regulatory developments and evolving stakeholder expectations.

Environment

(1) Environmental management

Our operations are primarily conducted at our service centres and office in Hong Kong. Given the service-oriented nature of its business, our principal environmental impacts primarily arise from energy consumption, greenhouse gas emissions, water consumption and waste generation associated with its daily operations. We seek to manage these environmental aspects in accordance with applicable laws and regulations and have incorporated environmental considerations into our operational practices and ESG management framework.

We are committed to promoting environmental stewardship and responsible use of resources. In implementing its environmental management approach, we seek to enhance resource efficiency, minimise unnecessary consumption and monitor environmental performance indicators relevant to its operations. We also review our environmental practices from time to time with a view to identifying opportunities for continuous improvement.

(2) Environmental targets

To support our environmental management efforts, we have established environmental objectives relating to greenhouse gas emissions, energy consumption and resource utilisation. We target to reduce Scope 1 and Scope 2 greenhouse gas emission intensity and energy consumption intensity by 5% by the year ending 31 March 2030 using FY2025 as the baseline year. We may review and update such targets from time to time having regard to our operational development, data availability and evolving regulatory and stakeholder expectations.

(3) Energy and water management

In terms of energy management, purchased electricity consumed at our service centres and office represents its principal source of energy consumption. As we do not operate energy-intensive manufacturing facilities, our energy consumption mainly arises from daily business operations.

BUSINESS

We seek to improve energy efficiency through various measures, including the use of energy-efficient lighting and equipment where practicable, optimisation of lighting and air-conditioning usage, regular maintenance of equipment and the promotion of energy-saving awareness among employees. Employees are encouraged to switch off idle equipment and lighting when not in use and to adopt energy conservation practices in their daily work. We also monitor our energy consumption and identify opportunities to enhance energy efficiency over time.

The following table details our energy consumption over the Track Record Period:

Energy Consumption	Unit	FY2024	FY2025	FY2026
Direct energy consumption ¹	MWh	5.17	19.28	25.08
Indirect energy consumption ²	MWh	195.29	226.73	296.29
Total energy consumption	MWh	200.46	246.01	321.37
Energy consumption intensity	MWh/million HKD revenue	0.63	0.79	0.87

Notes:

1. The increase in direct energy consumption was mainly due to increased business travel and corporate motor vehicle usage arising from the expansion of our operations during the Track Record Period.
2. The increase in indirect energy consumption was driven by the expansion of our operations, including the relocation and fitting-out of service centres and the operation of larger premises, resulting in increased electricity demand across our facilities.

We are also committed to promoting water conservation across its operations. Given the nature of our business, water consumption mainly arises from the daily operation of its service centres and office and is not considered material to our operations. We do not engage in any manufacturing or production activities that require significant water consumption.

To improve water efficiency, we have implemented water conservation measures, including promoting employee awareness through water-saving reminders, encouraging the responsible use of water resources and promptly addressing any identified leakage or maintenance issues. During the Track Record Period and up to the Latest Practicable Date, we did not encounter any material issues in sourcing water for its operations.

Our service centres and head office are located in leased premises where water consumption is generally not separately metered to individual tenants and the related charges are typically incorporated into rental or management fees. Accordingly, we do not have access to water consumption data that accurately reflects our own usage during the Track Record Period.

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(4) Greenhouse gas emissions

Our greenhouse gas emissions are mainly attributable to Scope 2 energy indirect emissions arising from purchased electricity consumed at our service centres and office, and Scope 3 other indirect emissions generated from activities across its value chain. Scope 1 direct emissions account for a relatively small portion of our total greenhouse gas emissions and mainly relate to fuel consumption from company vehicles. Given the nature of our business and the small scale of our vehicle fleet, emissions of nitrogen oxides, sulphur oxides and particulate matter during the Track Record Period were not material.

In view of our operational profile, purchased electricity remains the principal contributor to its greenhouse gas emissions. To reduce its carbon footprint, we seek to improve energy efficiency through energy conservation measures, including optimising electricity usage, promoting responsible use of office equipment and increasing employee awareness regarding environmental protection.

The following table sets forth our greenhouse gas emissions data during the Track Record Period:

Greenhouse Gas Emissions	Unit	FY2024	FY2025	FY2026
Scope 1 greenhouse gas emissions ¹	tCO ₂ e	1.44	5.36	6.97
Scope 2 greenhouse gas emissions ²	tCO ₂ e	85.23	94.38	120.91
Scope 3 greenhouse gas emissions ³	tCO ₂ e	92.32	113.67	128.83
Total greenhouse gas emissions	tCO ₂ e	178.99	213.41	256.71
Total greenhouse gas emissions intensity	tCO ₂ e/million HKD revenue	0.56	0.68	0.70

Notes:

1. Scope 1 greenhouse gas emissions are primarily generated from direct energy consumption, including fuel consumption by company vehicles where applicable. The increase was mainly due to increased business travel and corporate vehicle usage associated with our business expansion.
2. Scope 2 greenhouse gas emissions are generated from purchased electricity consumed at service centres and office. The increase was mainly due to the expansion, relocation and fitting-out of service centres, which increased electricity consumption.
3. Scope 3 emissions, where applicable, primarily arise from employee commuting, business travel, energy-related activities not included in Scope 1 or Scope 2 emissions, and paper consumption and disposal activities. The increase was mainly attributable to the growth in employee headcount, which resulted in higher estimated emissions from employee commuting, together with other indirect activities associated with our business expansion. We may further enhance its Scope 3 emissions identification, measurement and disclosure practices over time as our data collection and reporting processes continue to develop.

(5) Waste and packaging materials management

We recognise the importance of responsible waste management and seeks to minimise unnecessary waste generation during its operations. Given the service-oriented nature of its business, waste generated by us is predominantly non-hazardous and mainly comprises general office waste and packaging materials used in daily operations and service delivery processes.

BUSINESS

We operate primarily from leased service centres and office. General waste generated at these premises is collected and handled by the respective property management companies as part of the building management arrangements. As a result, we do not maintain complete records of the total volume of waste collected and disposed of from our premises.

To promote responsible resource utilisation, we seek to reduce unnecessary paper consumption through operational measures such as promoting electronic communication where practicable and encouraging prudent use of office materials. We also monitor certain consumables and packaging materials for which data is available to facilitate the assessment of resource usage trends over time.

Given the nature of our operations, the use of hazardous materials is limited. To the knowledge of the Directors, we did not generate any material hazardous waste during the Track Record Period.

The following table sets forth the information on our consumption of paper and packaging materials during the Track Record Period:

Packaging Materials Consumption	Unit	FY2024	FY2025	FY2026
Plastic-based packaging materials	tonnes	0.33	0.69	0.31
Paper-based packaging materials	tonnes	0.77	0.54	0.66
Other packaging materials	tonnes	0.40	0.81	–
Total	tonnes	1.50	2.04	0.97

(6) Climate-related risks and opportunities

Given the nature of its business, we do not generate any material emissions and wastes and pollutions. Nonetheless, we recognise that climate-related risks and opportunities may have implications to our operations, financial performance and long-term development. Such risks include transition risks arising from evolving regulatory requirements, increased expectations on environmental performance and potential changes in energy costs, as well as physical risks such as extreme weather events that may disrupt the operations of our service centres, affect customer traffic or otherwise adversely impact business continuity.

In response, we seek to incorporate climate-related considerations into our business strategy and operational decision-making. We monitor relevant regulatory developments and industry trends and evaluates potential impacts on our operations, with a view to enhancing our resilience and adaptability over time. We also recognise potential opportunities arising from improved resource efficiency, enhanced operational resilience and increasing stakeholder awareness of sustainability-related matters.

To support the management of climate-related risks and opportunities, we have established internal processes for the collection, monitoring and analysis of climate-related data, including energy consumption, greenhouse gas emissions and other environmental indicators. Such data enables us to assess our climate-related performance, identify trends and areas for improvement, and support informed decision-making.

BUSINESS

Employee Care

(1) Employment and labour standards

We regard our employees as an important resource supporting our long-term development and seek to maintain employment practices that are fair, lawful and aligned with our operational needs. We comply with applicable employment-related laws and regulations in Hong Kong and seeks to foster a workplace environment that promotes equal opportunity, diversity, inclusion and mutual respect. We have established policies and procedures covering recruitment, remuneration, training, performance management and employee welfare. For further details regarding our frontline staff, training arrangements and service delivery model, please refer to the section headed “Business – Employees”.

We are committed to maintaining lawful and ethical employment practices and prohibits the use of child labour, forced labour and other forms of unlawful employment. As part of our recruitment procedures, we verify the identity and eligibility of prospective employees to work in Hong Kong in accordance with applicable laws and regulations. We also seek to provide equal employment opportunities and do not tolerate discrimination or harassment on grounds such as gender, age, race, nationality, religion or other status protected by applicable laws.

We recognise the importance of employee development and provides training programmes designed to support employees’ professional competency and career development. Depending on their roles and responsibilities, employees may receive induction training, operational and service-related training, compliance-related training and ongoing professional development programmes. For further details regarding our staff training and development programmes, please refer to the section headed “Business – Employees”.

We also seek to foster a supportive and respectful workplace culture that promotes employee well-being and engagement. In addition, we maintain communication channels and internal procedures through which employees may raise concerns, provide feedback or report workplace-related matters.

The following table sets out the total number of our employees as at 31 March 2024, 31 March 2025 and 31 March 2026:

	As at 31 March		
	2024	2025	2026
Total Number of Employees	201	245	279

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(2) Occupational health and safety

We place importance on maintaining a safe and healthy working environment for our employees and have established internal policies and operational procedures to support workplace safety and reduce occupational risks. We provide workplace safety guidance to employees, promote awareness of safe working practices and seek to ensure that workplace incidents and hazards are reported and addressed in a timely manner. We also maintain insurance coverage for employees' compensation liability in accordance with applicable laws.

Given the nature of our operations, occupational health and safety considerations primarily relate to the safe delivery of services, the use of treatment equipment and the maintenance of a safe working environment at its service centres and office. The number and rate of work-related fatalities remained at zero during the Track Record Period. For further details on our occupational health and safety measures and practices, please refer to the section headed "Business – Health and Work Safety".

Product and Service Responsibility

(1) Product quality and safety

We place significant emphasis on the quality, consistency and safety of its services and products. Given the nature of its business, maintaining service quality and customer safety is important to our reputation, customer experience and long-term development.

To support service quality and safety, we have established internal policies and procedures relating to service quality management, the introduction of new treatments and the procurement of products and devices. We also seek to maintain standardised service procedures and quality control measures in the delivery of our services and products.

For further details regarding our quality control framework, service protocols and product and device evaluation procedures, please refer to the sections headed "Business – Quality Control, Safety and Complaint Management" and "Business – Suppliers, Procurement and Inventory Management".

(2) Customer welfare and selling practices

We attach importance to customer welfare, responsible selling practices and the accuracy of information provided to customers. We seek to provide transparent and accurate information regarding its services and products and to comply with applicable laws and regulations in Hong Kong relating to advertising, labelling and consumer protection.

We also seek to maintain procedures for handling customer enquiries and complaints and reviews customer feedback as part of our ongoing efforts to enhance service quality and customer experience. Through our customer communication and service processes, we seek to promote informed decision-making and maintain customer trust.

BUSINESS

For further details regarding customer experience, complaint handling and service delivery, please refer to the section headed “Business – Quality Control, Safety and Complaint Management”.

(3) *Data security and customer privacy*

We recognise the importance of protecting customer data and personal information during its operations. We are subject to data protection requirements in Hong Kong, in particular the Personal Data (Privacy) Ordinance, and have established internal controls and procedures governing the collection, holding, processing, use and protection of personal data.

We seek to safeguard customer information by restricting unauthorised access, maintaining appropriate data handling practices and supporting operational needs through system and process controls. Access to customer information is restricted on a need-to-know basis, and employees are expected to comply with our internal requirements relating to confidential information and personal data protection.

Compliance with applicable personal data protection requirements may entail ongoing effort and expense, including the need to maintain secure information handling processes and to enhance data security measures from time to time. Against this backdrop, we seek to maintain customer trust through responsible data management and ongoing review of its privacy-related controls.

For further details on customer data handling in service processes, please refer to the section headed “Business – Data Security”.

Supply Chain Management

We recognise the importance of maintaining a responsible and reliable supply chain in support of its operations. We have established policies and procedures for supplier and service provider selection, evaluation and procurement with a view to managing quality, operational and compliance risks.

When assessing service providers and suppliers, we may consider factors such as product quality, service standards, qualifications, track record, reliability and compliance with applicable requirements. We also seek to maintain ongoing communication with service providers and suppliers to support the stable supply of products and services required for our operations.

Given the nature of our business, products and devices supplied to us play an important role in supporting service delivery. Accordingly, we seek to procure products and services from suppliers that satisfy its operational and quality requirements.

For further details regarding supplier selection criteria, procurement procedures and quality control measures, please refer to the section headed “Business – Suppliers, Procurement and Inventory Management”.

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Business Ethics and Anti-corruption

We seek to maintain high standards of integrity and ethical conduct in our business activities. We adopt a zero-tolerance approach towards bribery, corruption, extortion, fraud and money laundering, and expects its directors, employees and business partners to comply with applicable laws and internal conduct requirements.

To support ethical business conduct, we have established policies and procedures relating to employee conduct, conflict of interest management and compliance awareness. We also maintain reporting channels through which employees and, where appropriate, third parties may raise concerns regarding suspected misconduct, bribery, corruption or other improper behaviour.

We seek to ensure that reported matters are handled appropriately and confidentially and that individuals raising concerns through established channels are protected from retaliation to the extent permitted by applicable laws and internal procedures. We also seek to promote awareness of ethical business conduct and compliance obligations among employees from time to time.

During the Track Record Period and as of the Latest Practicable Date, we were not aware of any material non-compliance, nor any Director or employee being involved in misconduct relating to bribery, corruption or money laundering.

Community Investment

As a healthcare service provider, we recognise the importance of contributing to the well-being of the communities in which it operates. Through volunteer activities and community engagement initiatives, we seek to support vulnerable groups and promote social welfare.

During the Track Record Period, we participated in various community investment activities, including support for elderly care services, children's welfare programmes, community health education, disaster relief initiatives and assistance to underprivileged families. We also encourage employees to participate in volunteer activities and community services as part of our commitment to corporate social responsibility.

We will continue to identify opportunities to contribute to the community through charitable engagements, volunteer services and other public welfare initiatives.

REGULATORY COMPLIANCE AND LICENSES

During the Track Record Period and up to the Latest Practicable Date, we believe we have obtained all requisite licenses and certificates that are material to our operations, which consist solely of our business registration certificates for our Operating Subsidiaries. Our latest business registration certificate for VG Zenith commenced on 18 October 2025 and expires on 17 October 2026. Our latest business registration certificate for Victor Zenith commenced on 19 March 2026 and expires on 18 March 2027.

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Our Directors confirm that our Group did not experience any material difficulties in obtaining and/or renewing our business registration certificates. Further, our Directors are not aware of any circumstances that would significantly hinder or delay the renewal of our business certificates upon their expiration. Therefore, our Directors do not foresee any major difficulties in compliance with such business registration requirements that would cause material impact on our Group's operations and business.

All of our staff have also obtained necessary qualifications required for their practice. For details, please refer to the section headed "Business – Our Professionals".

During the Track Record Period and up to the Latest Practicable Date, we had not been and were not involved in any material non-compliance incidents that had led to fines, enforcement actions or other penalties that could, individually or in the aggregate, have a material adverse effect on our business, financial condition and results of operations. Given the internal control system which we have implemented to ensure our compliance with relevant laws and regulations in all material respects of our business, our Directors confirm that none of the non-compliance incidents are systemic in nature.

The advertisement of our treatments and sale of products are regulated under the UMAO. During the Track Record Period and up to the Latest Practicable Date, the Drug Office of the Department of Health issued warning letters to our Group on two separate occasions concerning potential non-compliance of certain advertisements with the UMAO:

- 12 December 2023: VG Zenith received a warning letter regarding website advertisements that potentially contravened the applicable advertising restrictions under the UMAO. In response, we removed or replaced the potentially non-compliant wordings. Our Directors confirm that no prosecution or follow-up enforcement action has been taken by the Department of Health against us, and as at the Latest Practicable Date, the warning letter issued on 12 December 2023 was already time-barred for prosecution.
- 21 May 2026: VG Zenith and Victor Zenith each received four warning letters relating to various online and offline advertisements that potentially contravened the applicable advertising restrictions under the UMAO. Upon consulting with the Drug Office of Department of Health to clarify the specific areas of concern, we removed or revised the relevant promotional language. Our Directors confirm that no prosecution or follow-up enforcement action has been taken by the Department of Health regarding the warning letters dated 21 May 2026 as at the Latest Practicable Date.

During the Track Record Period and up to the Latest Practicable Date, no charge had been laid against and no penalty has been imposed on us in respect of the above suspected contraventions. Our Operations Department is responsible for reviewing and managing our marketing and advertising materials. To prevent the recurrence of similar non-compliance incidents, we have implemented the following internal control measures:

- (i) the adoption of compliance guidelines to provide specific guidance to staff members on advertisements to ensure compliance with relevant laws and regulations, including the UMAO;

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- (ii) our Operations Department review all marketing materials against internal guidelines to ensure compliance with the relevant requirements under the laws of Hong Kong before publication;
- (iii) we have distributed relevant training materials to our management and marketing teams where they were given an overview on the applicable laws and regulations of Hong Kong relating to advertising within the context of UMAO;
- (iv) we will arrange trainings to reinforce our management team's and marketing team's awareness on applicable Hong Kong laws and regulations, including the UMAO; and
- (v) we will consult relevant governing authorities and our external legal advisers for guidance in case of any uncertainties or queries regarding compliance matters related to advertising.

We endeavour to maintain an open and cooperative relationship with the Department of Health and will continue to address any feedback or warnings in a timely manner, with a view to ensuring ongoing compliance with applicable advertising regulations.

LEGAL PROCEEDINGS

From time to time we have been, and may in the future be occasionally, involved in legal proceedings or disputes in the ordinary course of business that are common for our industry, including minor employment disputes. During the Track Record Period and up to the Latest Practicable Date, none of our Company or any other members of our Group were involved in any claims or litigation or arbitration proceedings of material importance and no litigation, claim or arbitration proceeding of material importance is known to our Directors to be pending or threatened against any member of our Group, and our Directors are of the view that none of the litigation claims or disputes involving our Group is material to our Group.

INTELLECTUAL PROPERTIES

We operate our business under the brand name "ANKH", which we believe embodies our established reputation for quality services and products. As at the Latest Practicable Date, our Group had registered 11 trademarks and one domain name in Hong Kong which we believe are material to our business. We are also in the process of applying for 4 trademarks in Hong Kong which we believe are material to our business. For details of our material intellectual property rights, please refer to "Appendix IV – Statutory and General Information" of this document.

Our Directors confirm that, during the Track Record Period and up to the Latest Practicable Date, we were not aware of any material infringement (i) by us of any intellectual property rights owned by third parties; or (ii) by any third parties of any intellectual property rights owned by us, and there were no disputes or infringements in connection with our intellectual property rights pending or threatened against our Group which could have a material adverse effect on our operations or financial performance, and we had not been involved in any material proceedings, disputes or claims in relation to infringement of any intellectual property rights.

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AWARDS

We have received a number of awards and accreditations in recognition of our services and innovation. The following table sets forth the awards and accreditations we have been granted up to the date of this document:

Year	Award	Organised/Granted By
2021	The Most Trusted Health Brand Award among Healthcare Workers Award	Hong Kong Health Care Federation
2022	The Most Reliable Pain Treatment Group in Asia Pacific – Hong Kong Most Valuable Corporate Awards	MythFocus
2022	2022 Most Innovative Enterprise Award	Business Innovator
2022	01 Gold Medal Awards – Outstanding Pain Relief Health Centre	HK01
2023	01 Gold Medal Awards – Outstanding Pain Relief Health Group	HK01
2025	Outstanding Pain Relief Technology Award	Hong Kong Commercial Times
2026	International Pain Relief Group Excellence Award	EJ Health Awards of Excellence