



昆侖國際金融集團有限公司

**KVB Kunlun Financial Group Limited**

(於開曼群島註冊成立的有限公司)

(Incorporated in the Cayman Islands with limited liability)

股份代號 Stock Code: 8077



2016 年環境、社會和管治報告  
2016 Environmental, Social and Governance Report



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## I. ABOUT THIS REPORT

### Report Profile

This report provides information on our policies and actions as a corporate citizen operating in the financial investment services sector and our relationships with major stakeholders.

This report describes our efforts to support the principles of sustainable development during the financial year of 2016. It focuses on the economic, environmental and social issues that have impacts on our sustainability and that are of interests to our stakeholders.

### Reporting Period

This is KVB Kunlun Financial Group Limited's (referred to in this report as "KVB" or "the Company" or "the Group" or "we") first Environmental, Social and Governance ("ESG") report. This report covers the financial year ended 31 December 2016.

### Reporting Scope

This report covers our businesses in New Zealand, Australia, Hong Kong and mainland China after taking into account the materiality of sustainability issues.

### Environmental, Social and Governance Reporting Guide

To comply with the disclosure obligations set out in the Environmental, Social and Governance Reporting Guide in Appendix 20 to the Rules Governing the Listing of Securities on the Growth Enterprise Market of The Stock Exchange of Hong Kong Limited (hereinafter called "the ESG Reporting Guide"), we start to report the ESG information commencing from the financial year of 2016 to demonstrate our commitment to meet the expectations of our stakeholders.

## I. 關於本報告

### 報告範圍

在本報告中，我們披露了作為一家經營金融投資服務的企業公民實施的政策及採取的行動，以及與主要持份者的關係。

本報告描述了我們為支持可持續發展的原則，而在2016年財政年度中所作出的努力。報告重點著墨於一些我們的持份者所關注並可影響可持續發展的經濟、環境和社會事宜。

### 報告期間

本報告是昆侖國際金融集團有限公司（下稱「KVB」或「本公司」或「本集團」或「我們」）的首份環境、社會及管治（下稱「ESG」）報告。本報告涵蓋截至2016年12月31日止財政年度。

### 報告範圍

本報告涵蓋本集團在新西蘭、澳洲、香港和中國內地的業務，在決定報告範圍時亦已考慮到各個可持續發展因素的重要性。

### 《環境、社會及管治報告指引》

為符合香港聯合交易所有限公司創業板《上市規則》附錄20有關《環境、社會及管治報告指引》（下稱「ESG報告指引」）的披露責任要求，本集團於2016財政年度開始撰寫ESG報告，以回應各持份者對本集團的期望。

## II. ENVIRONMENTAL PROTECTION

We appreciate the importance of raising the awareness of our employees to understand our environmental impact and stress our determination by taking various reduction initiatives mentioned below to take action in reducing our carbon footprint. We will continue to support our people in reducing environmental impact in their personal and business activities as well as in our communities and our stakeholders in different areas of the world.

### 1. Emissions

Energy consumption accounts for a major part of greenhouse gas emissions. Therefore, various energy saving measures (refer to below section "Use of Resources" for details) have been undertaken to improve energy efficiency and reduce energy consumption of our operations. Waste management of our operations mainly involves the collection of waste paper for recycling. No hazardous waste was generated in connection with the Group's business.

### 2. Use of Resources

The Group recognizes its responsibility to protect the environment in the course of its operation and continually seeks to identify and reduce environmental impacts attributable to its operational activities.

#### (a) Electricity

All staff members are encouraged to switch off the power of illumination, air conditioners and computers, personal electronic devices and common office equipment when they are not in use. We endeavor to keep all electronic appliances including air conditioners, microwaves, coffee machines, etc. well-maintained in our offices. We encourage all computers being turned to energy saving mode.

## II. 環境保護

我們意識到提高員工對環境影響認識的重要性，並採取以下各種措施強調減排決心，以行動減少我們的碳足印。我們將繼續支持員工、社區和世界不同地區的持分者於個人和商業活動中減少對環境的影響。

### 1. 排放物

能源消耗佔溫室氣體排放中的一大部分。因此，我們採取各種節能措施（詳見下文「資源使用」一節），提高能源效益，減低營運所產生的能源消耗，而廢物管理則集中於收集廢紙用於回收。本集團業務並無產生危險廢物。

### 2. 資源使用

本集團意識到在營運中保護環境的責任，並持續辨識及減少經營活動對環境所造成的影響。

#### (a) 電源

我們鼓勵所有員工在不使用電燈、空調、電腦、個人電子設備和公共辦公設備時切斷電源；努力維持所有電器的良好保養，包括空調、微波爐、咖啡機等，並鼓勵把所有電腦設定為節能模式。

**(b) Water**

We raise the consciousness of staff about efficient use of water by posting “save water” sign in pantry, and reducing waste of potable water.

**(c) Paper**

Staff are aware of collecting and reusing single-side printed papers for internal documents. Space, margin and page efficiency check with the help of printing preview is recommended. Other paper saving print default settings such as the adoption of economic mode, black and white output colour, selection of bypass tray for reusing recycled paper are encouraged. To avoid unnecessary wastage and promote effective usage of papers, all staff have been educated to implement “think before printing” principle, as proliferation of the use of email far outweighs that of printing off hardcopies.

**(d) Compliance**

In 2016, there was no non-compliance incident in relation to environmental protection that has a significant impact on the Group.

### 3. Significant Impact on the Environment and Natural Resources

The impact of the Group on the environment and natural resources is not significant. Consumption of energy mainly stemmed from the use of electricity, water and papers in office areas. During the reporting year, we have stipulated a number of measures to reduce the use of resources and disposal of waste (refers to above sections “Emissions” and “Use of Resources” for details).

**(b) 用水**

我們著重提高員工節約用水的自覺性，減少浪費，例如，在茶水間張貼「節約用水」標誌、減少浪費飲用水等。

**(c) 紙張**

員工自覺地收集及重用已打印的單面紙於列印內部文件。我們鼓勵員工先預覽列印設定，如字距、邊距和頁面；其他節省紙張的預設列印設定，如選用經濟模式、黑白列印、重用回收紙列印等。為避免造成不必要的浪費和促進有效地使用紙張，所有員工都必須履行「列印前三思」原則，並鼓勵多用電子郵件，減少使用紙張。

**(d) 合規性**

於2016年度，沒有發生對本集團產生重大影響之不遵守環境保護的事件。

### 3. 對環境和天然資源的重大影響

本集團沒有對環境和天然資源造成重大影響。資源消耗主要來自辦公室用電、用水和紙張。於報告年度，我們制定了一系列的措施減少資源消耗和妥善處置廢物（詳見上文「排放物」和「資源使用」一節）。

### III. EMPLOYMENT AND LABOUR PRACTICES

We recognize that employees are the greatest assets of our Group and are the key driver of our sustainability and long-term growth. We maintain policies for compensation, dismissal, recruitment and promotion, working hours, rest periods and other benefits. We aim at building high quality relationship with them based on mutual respect to encourage creativity, flexibility and commitment to accomplish our mission of providing quality products and services to our clients. To achieve this, we create opportunities to attract, develop, retain and reward our talented staff by offering them, under different conditions, commensurate remuneration, personal growth and career development training, and fringe benefits, such as medical insurance, retirement benefits, pension, long service awards, leave vacation, share options and other employment benefits as detailed below.

#### 1. Employment

##### (a) Compensation and Other Benefits

In addition to the basic salaries, we have a discretionary annual bonus scheme which is established to recognize and reward staff members for their individual performance and contributions to the growth of business, and to differentiate between different levels of performance by staff members during the previous calendar year. Long service awards are given to staff who have completed 5 years of service with KVB and who remain in service at the time when the award is presented. To express our appreciation of the staff and congratulate them in such material events as marriage and having a new born baby, we provide them with gift vouchers. The Group operates a share option scheme as incentives and rewards to eligible participants who contribute to the success of the Group's operations.

### III. 僱傭及勞工慣例

我們一直視員工為集團最大的資產，對於可持續發展和長遠發展起著關鍵作用。我們具備薪酬、解僱、招聘及晉升、工時、休息時間和其他福利的政策。我們致力以互相尊重為前提，建立良好的僱傭關係，鼓勵員工創新、靈活和致力達成我們為客戶提供優質產品和服務的使命。為了實現這一點，我們根據不同的情況向員工提供相稱的薪酬、個人發展和職業發展培訓，以及各種福利，如醫療保險、退休福利、長期服務獎、假期、購股權和其他就業福利，藉以創造有利條件吸引、發展、挽留和獎勵人才。詳情如下：

#### 1. 僱傭

##### (a) 薪酬及其他福利

除了基本薪金外，我們制定了一個酌情年度獎金計劃，認可和獎勵個人表現傑出和對公司業務有貢獻的員工，並評核員工在上一個年度的表現水平。我們設立長期服務獎，頒予在KVB服務滿5年並於頒獎時仍然在職的員工。為答謝員工的付出和祝賀他們結婚或有子女出生，我們會送上禮券。我們亦設立了購股權計劃，獎勵對本集團業務發展有貢獻的合資格員工。

**(b) Recruitment and Promotion**

We select the most qualified persons by giving appropriate consideration to such factors as educational qualifications, relevant experience, demonstrated competencies and skills, desirable personal traits and potential for further development during recruitment and promotion. To fill a vacant position, where both an internal candidate and an external candidate qualify for a position, consideration will be given to the internal candidate subject to interviews, assessment tools and tests. However, any internal transfer application must be endorsed by the applicant's immediate supervisor.

**(c) Dismissal**

The termination of an employment contract by the Company shall be complied with the local laws and regulations in terms of notice or payment in lieu of notice and termination payment.

**(d) Working Hours**

All staff members are expected to work the necessary hours to fulfill their job responsibilities and duties. The remuneration recognizes that staff members will work additional hours in accordance with the needs of position and the needs of the business. For some departments, the business hour may vary depending on their operations. Some occasions might require that some staff members rotate their lunch period to provide continuous service. This rotation will be coordinated by the Department Manager.

**(b) 招聘及晉升**

在招聘及晉升員工時，我們會適當考慮其教育資歷、相關經驗、展現的能力和技能、個人特質和進一步發展的潛力等因素，以發掘最佳人選。我們從內部和外部選擇最合適的人士填補職位空缺，惟任何內部調職申請必須經申請人的直屬主管批准，根據面試表現、評核和測試結果再作決定。

**(c) 解僱**

如本公司終止員工合約，須根據當地法律和法規要求向有關員工發出通知或支付代通知金。

**(d) 工時**

所有員工在日常工作中必需完成工作時數，確保按時完成任務。我們支付給員工的薪酬水平已充分考慮到該員工的職責及業務所需的工作時數（包括額外的工作時數）。部份部門的辦公時間或因其營運的業務所需而有差異，亦會為了提供不間斷服務而需要部門經理協調員工輪流午膳。

**(e) Rest Periods**

Other than the statutory holidays, statutory maternity/paternity leave and the annual leave entitlement stated in the Letter of Employment or general benefit scales of different ranking, our staff members are allowed to apply for paid marriage leave and also leave for bereavement/compassionate involving close family members. We shall compensate substituted holidays to staff who work on statutory holidays according to the local regulations.

**(f) Equal Opportunity, Diversity and Anti-discrimination**

It is important to promote equal opportunities in our workplace in respect of staff recruitment, fringe benefits, compensations, internal transfers, promotion prospect, performance appraisal, training and development so as to establish an environment for our people to maximize their potential, regardless of age, gender, pregnancy status, marital status, ethnicity, disability, religious belief, colour, nationality race and geographical region. We expect all staff members to demonstrate appreciation, care and respect for each other, regardless of personal differences that is not related to job requirements or roles. Should there be any enquiries, grievances or complaints in respect of discrimination arising from recruitment, promotion, transfer, training and termination processes or decisions, or grievances related to sexual or disability discrimination, harassment and victimization in our workplace, employees can seek help from the Branch Manager or the Human Resources Department.

**(e) 休息時間**

除了法定假期、法定產假／侍產假，和僱傭合約上列明的年假，或按職級賦予的一般福利外，我們的員工可以申請有薪結婚假期，直系親屬身故亦可申請喪親／恩恤假期。員工如在法定假期工作，我們將根據當地法規提供補假補償。

**(f) 平等機會、多元化發展和反歧視**

我們重視平等，務求員工在招聘、福利、補償、內部調職、晉升、工作表現考核、培訓和發展等方面得到平等對待，創造有利環境給他們發揮最大潛能，不受年齡、性別、懷孕狀況、婚姻狀況、種族、殘疾、宗教信仰、膚色、國籍和地區影響。我們期望所有員工能互相欣賞、關懷和尊重，不囿於與工作要求或角色無關的個人差異。如懷疑在招聘、晉升、調職、培訓和終止合約過程中受到歧視，或在工作上遭到性別或殘疾歧視、騷擾或不合理對待，員工可向分公司經理或人力資源部提出查詢、表達不滿或作出投訴。



**(g) Compliance**

In 2016, there were no non-compliance incidents in relation to human rights and labour practices that had a significant impact on the Group.

**2. Health and Safety**

The Group will ensure that there is an integrated approach to health and safety, where both illness and injury prevention are accepted as part of management practice. Staff members are expected to exercise reasonable care and attention and avoid taking any undue risk that might lead to any accident or injury. There are evacuation procedures in case of fire in offices, administration and operation areas to assist employees to take sensible immediate action. All staff members are expected to give their unconditional support to maintain a healthy, smoke-free working environment. Smoking is absolutely prohibited in the office areas, toilets or stairwells.

In 2016, there were no non-compliance incidents in relation to occupational health and safety that had a significant impact on the Group.

**(g) 合規性**

於2016年，沒有發生對本集團產生重大影響之不遵守人權和勞工慣例的事件。

**2. 健康和 safety**

本集團對健康和 safety 採取全面的防治措施，預防疾病和傷患都是管理常規的一部分。員工應採取合理措施，並避免任何可能導致意外或傷亡的不適當之風險。當辦公室、管理和作業範圍發生火災，疏散程序能有效地幫助員工採取明智、即時的行動。所有員工應不遺餘力地打造一個健康、無煙的工作環境，嚴禁在辦公區域、洗手間或梯間吸煙。

於2016年，我們沒有發生有關違反職業健康和 safety 法律和法規的事件。

### 3. Development and Training

The Group is committed to provide staff members with the opportunity to pursue a meaningful and rewarding career, and will help them to realize their potential, taking into account the objectives of the Group as a whole. Colleagues are expected to take the initiative to identify their own needs and take steps to improve their skills and knowledge. Supervisors and Managers are expected to ensure that their subordinates are properly coached and guided. Staff members will be nominated for professional training to meet current and future business needs. During the reporting year, staff members attended a seminar in relation to the anti-money laundering and counter-financing of terrorism policy.

All new staff members will be invited to attend a staff orientation to familiarize them with the organization, policies, products and services of the Group. Manager or Supervisor will give the new comers on-the-job training and other relevant coaching. Throughout the period, Manager or Supervisor will be responsible for monitoring the progress, giving feedback, assistance, advice and assess the necessary knowledge and skills of the employees to perform their duties at the expected level of standard.

### 4. Labour Standards

To comply with the relevant labour laws and regulations, we strictly prohibit unethical hiring like child and forced labour.

### 3. 發展及培訓

本集團致力提供機會，支持員工追求有意義和發展豐盛的事業，符合集團目標的同時亦幫助員工展現潛能；員工亦應注意工作上對他們的要求而提升所需技能和知識。主管和經理亦要確保下屬得到合理的指導和培養並推薦員工接受專業培訓，以應付當前和未來的業務需求。於報告年度，員工參加了有關打擊洗錢及恐怖分子資金籌集政策講座。

所有新員工會獲邀參加入職培訓，以熟習本集團的組織架構、規章制度、產品和服務。經理或部門主管負責向新員工提供在職培訓和其他相關的指導；同時亦應監察進度、提供反饋、協助、建議和評估知識和技能水平，確保員工執行工作時可以達到預期的標準。

### 4. 勞工準則

為了遵守有關的勞動法律法規，我們嚴格禁止非法僱傭如童工和強制勞工。

## IV. OPERATING PRACTICES

### 1. Supply Chain Management

We believe that building a sustainable supply chain can create value for our employees, suppliers and service providers, communities and our clients. We emphasize on facilitating the interaction and communication with our suppliers and service providers. In order to establish an efficient and green supply chain with our suppliers and service providers, we aim at maintaining long-term strategic and co-operative relationships with those counterparties with good credit history, solid reputation, high product or service quality, proven track records of environmental compliance and sound commitment to social responsibility. We conduct periodic reviews on the performance of our suppliers and service providers with an objective of a better control over and an assurance of the financial products and service quality.

### 2. Product/Service Responsibility

We have been dedicated in providing high value-added financial products and high quality professional investment services with the highest degree of integrity to our clients at competitive rates. We always seek to exceed our clients' expectation. In terms of sustainability, client satisfaction is vital to our growth in the future. We summarize below our approach in achieving this aim and the significant efforts that KVB has put into its operations:-

#### (a) Licences and Registrations

We have a global team of financial specialists, who hold necessary licences required by laws and regulations, dedicated to providing quality professional investment services over a wide range of financial products. To avoid any doubt on the fitness and properness, they are mandated to undertake sufficient hours of continuous professional training per calendar year for each of the regulated activities. A copy of all their attendance to training courses is required to be submitted to our Compliance Officer for records and examination by the regulatory bodies when necessary.

## IV. 營運慣例

### 1. 供應鏈管理

我們相信，可持續的供應鏈可以為員工、貨品供應商和服務供應商、社區和客戶創造有利價值。我們強調促進與供應商和服務供應商之間的互動和溝通。為了與他們共同建立有效的綠色供應鏈，我們與具有良好信用、穩健商譽、高質的產品或服務水平、良好環境合規紀錄，以及對堅守社會責任的團體保持長期戰略和夥伴關係。我們定期審查供應商和服務供應商的表現，旨在更有效地控制和確保金融產品和服務的質量。

### 2. 產品／服務責任

我們一直堅持誠信，以具備競爭力的收費，為客戶提供高增值的金融產品和高質素的專業投資服務。我們追求卓越，努力超越客戶期望，因為我們深明客戶滿意度是未來業務增長的關鍵。為了實現這目標，KVB在其營運中有以下舉措：

#### (a) 牌照和註冊

我們擁有一支國際金融專才團隊，他們持有法律和法規要求的相關牌照，致力就各種金融產品提供高質素、專業的投資服務。為避免客戶對他們的專業資格有任何質疑，員工每年必須針對每個受規管的活動，參加一定時數的專業訓練。所有員工的培訓課程的出席紀錄副本必須交給我們的合規主任存檔，並作為監管機構審查之用（如需要）。

**(b) Client Asset Security**

To account for and better safeguard client assets, we maintain clients' money received in segregated bank accounts and all movements of funds in clients' accounts require prior approval supported by appropriate documents. There are adequate internal controls and procedures in place enabling us to take reasonable steps to track the movement of client monies.

**(c) Financial Products and Services Due Diligence**

We shall first understand the investment products before we recommend them to our clients, and we offer services or products to our clients only if we have the relevant licence and expertise. By understanding the investment objectives of our clients, their risk appetite and other relevant facts known about them, we provide them with the most suitable products and services together with all relevant material information to help them making informed investment decisions. We shall ensure that advice to our clients are honest and fairly expressed. We shall document and retain the reasons for each product recommendation made to every client.

**(d) Secure, Stable, Effective and Efficient Trading Systems**

Our Group values the security of information system which contains clients' personal information, trading records and other information essential to our Group. The security of the application systems and networks are under round-the-clock monitoring internally as well as periodic independent professional reviews. We have employed advanced encryption technology to ensure all client information remains secured throughout the trading process.

**(b) 客戶資產安全性**

為了更好地保護客戶資產，我們收到客戶的資金後會存放於獨立的銀行帳戶，動用客戶帳戶內的資金時，都必須預先取得批准並有適當的文件作支持。我們亦有充分的內部監控和程序，使我們能夠迅速地採取合理的措施追蹤可疑的客戶資金流向。

**(c) 金融產品及服務的盡職調查**

在向客戶推薦投資產品前，我們會先瞭解該產品並擁有相關牌照和專業知識。在清楚客戶的投資目標、可承受的風險程度及其他相關事宜後，我們會為客戶介紹最合適的產品和服務，以及披露所有相關的重要資訊，以協助他們作出明智的投資決定。我們會以誠實和公正的態度向客戶表達建議。我們亦會把為每位客戶推薦產品的原因記錄並存檔。

**(d) 安全、穩定、有效的交易系統**

本集團重視信息系統的安全性，包括客戶的個人資料、交易紀錄和直接影響本集團的重要數據。我們二十四小時監控應用系統和網絡安全，以及定期進行獨立專業審查。在整個交易過程中，我們採用先進的加密技術確保所有客戶數據的安全。



**(e) Know Your Client**

In order to provide the highest level of service and establish a credit standing of our client, we conduct and “know you client” document review prior to the opening of new client accounts to understand the identity, investment objective, risk tolerance level, investment experience, financial status, occupation and other relevant information of the client and obtain relevant documents for identification and proof. A periodic review will be taken to update the profile of clients.

**(f) Customer Data Protection and Privacy Policies**

Our policy is to handle confidential information of the Group and that of our clients with integrity and discretion in accordance with applicable laws. Confidential information may be subject to disclosure requirements according to the applicable laws and regulations and shall be exchanged internally and exclusively on a “need-to-know” basis. During the reporting period, there was no complaints received concerning breaches of customer privacy and loss of data.

**(g) Customer Complaints**

Our staff are trained to deal with client complaints promptly and courteously with detailed procedures stated in the Complaint Handling Procedure Manual of the Group.

**(e) 瞭解你的客戶**

為提供最佳的服務和建立客戶信心，新客戶開立賬戶前，我們會進行「瞭解你的客戶」審查，以確認其身份、投資目標、風險承受能力、投資經驗、財務狀況、職業和其他相關資訊，並索取相關文件以便識別和作為證據並保存紀錄。我們亦會定期審查和更新客戶資料。

**(f) 客戶資料保護和隱私政策**

我們根據法律、以誠信和謹慎的態度處理集團和客戶的機密信息。我們可能會根據適用的法律和法規的要求披露此等機密信息，並只會在「需要知情」的基礎上作內部溝通。於報告期間，我們沒有收到關於違反客戶隱私和遺失數據的投訴。

**(g) 客戶投訴**

我們的員工均經過培訓，學習遵照「集團投訴處理程序手冊」的指引及時和有禮地處理客戶投訴。

**(h) Integrity**

To ensure that our growth is sustainable, we are committed to conduct business with the highest degree of integrity and respect for rules, laws and regulations, and our values. All staff members of the Group, including directors, management members of all levels, employees, temporary workers, trainees, interns, independent contractors and agent/consultants, are required to adhere to the contents of our internal Code of Conducts in letter and spirit. In case of any conflict between the contents of the internal procedures and the external rules, laws and regulations laid down by the governing authorities, the stricter of the two must be followed to the extent that the local laws and regulations are not violated.

**(i) Compliance**

During the reporting year, there were no incidents of non-compliance with laws and regulations concerning the provision and use of products/services.

**(h) 誠信**

為確保集團業務的可持續增長，我們要求各人必需擁有高度的誠信，以及遵從條例、法律、法規行事及支持彼此認同的價值。本集團所有員工，包括董事、各級管理層、員工、臨時員工、學徒、實習生、獨立承包商和代理／顧問，都必須遵守我們內部行為準則。如果內部指引的內容與監管機構制定的法律和法規存在任何衝突，員工必須遵守兩者之間較嚴謹的要求，並確保沒有違反當地的法律和法規。

**(i) 合規性**

於報告年度，沒有發生違反有關產品／服務的法律和法規事件。

### 3. Anti-corruption

#### (a) *Anti-money Laundering (AML) and Counter-Financing of Terrorism (CFT) Policy*

To protect the interests of stakeholders and comply with the laws and regulations, we have strict policies and procedures relevant to each particular transaction including the verification of clients' identities, assessment of clients' honesty, integrity, commercial ability and creditworthiness as well as the reporting of suspicious transactions internally and to the appropriate authorities when required. In avoiding dealing with potential money launderers, terrorist financiers or handling funds derived from any criminal activity, we refuse the operation of any accounts for anonymous clients or in obviously fictitious names. We have been providing appropriate trainings to staff in the client service, client administration and dealing department to enable them to understand the money laundering and financing of terrorism techniques and send periodic circulars to all staff to remind them of their responsibilities and alert them to any new money laundering techniques being used.

Staff is required to bring any suspicious transaction to the immediate attention of compliance manager for review. The compliance manager shall conduct a thorough investigation and determine whether suspicion remains and further actions should be taken.

#### (b) *Anti-corruption*

In addition to the AML and CFT policy and procedures mentioned above, our Group maintains and effectively implements comprehensive system of internal control policies and procedures for prevention of corruption, frauds, bribery, extortion and any malpractice or unethical practices.

### 3. 反貪污

#### (a) *打擊洗錢及恐怖分子資金籌集政策*

為了保護持份者的利益並遵守法律和法規的要求，我們對每宗交易均需嚴格遵守規章制度，包括驗證客戶身份，評估客戶誠信、營商能力和信譽；如碰上可疑交易時，進行內部通報及在必要時向有關當局舉報。為了避免參與潛在的洗錢活動、協助恐怖分子融資或處理任何來自犯罪活動的資金，我們拒絕為客戶開立匿名或虛假帳戶。我們已為客戶服務、客戶管理和交易部門的員工提供適當的培訓，使他們能夠充分掌握罪犯常用的洗錢和恐怖分子籌集資金的技倆，提醒他們自身的責任；當發現有任何新興的洗錢技術時，亦會向所有員工發出通知。

如員工發現任何可疑交易，必需立即通知合規主任進行審查。合規主任應徹底調查，並判斷是否仍有疑點並繼續跟進。

#### (b) *反貪污*

除了上述提到的打擊洗錢及恐怖分子資金籌集的政策和程序外，本集團亦制定了一套全面的內部監控系統，以有效地預防貪污、欺詐、賄賂、敲詐和任何不當或不道德的行為。

**(c) Whistle-blower procedures**

We have established a written communication channel for whistleblower who can be any employee, director or internal contractor of the Group, whether full time, part time or casual at any level of seniority, makes or attempts, whether anonymously or not, to disclose allegedly unacceptable conducts which are corrupt, dishonest or fraudulent activities; are illegal or breaches any law or policy of the Group; or cause loss to the Group, or otherwise which may be detrimental to its interests.

The whistleblower may choose to send his/her written statement to the manager, Chief Operating Officer, a member of the Group Executive Team or the local human resources representative. The Group takes reasonable efforts to protect the whistleblower's identity, if requested, subject to legal or regulatory constraints.

The whistleblower is protected from unjustified/unfair disciplinary action or other improper employment practices if the disclosure is made in good faith and/or is based on reasonable grounds. Any staff member who knowingly makes false or reckless allegations shall be subject to disciplinary actions including termination of employment.

**(d) Compliance**

During the reporting year, no legal cases regarding corrupt practices were brought against KVB or its employees.

**(c) 舉報機制**

我們已經為本集團的所有員工、董事或內部承包商建立了一個書面舉報渠道，不論是全職、兼職、或任何職級的員工，都可以向集團舉報（不論匿名與否）任何懷疑涉及貪污、不誠實行為、欺詐、違法、違反本集團任何規章制度、或可能對本集團造成損失或以其他方式損害其利益的可疑活動。

舉報人可以將他／她的書面陳述發送給經理、首席營運官、集團行政團隊成員或當地人力資源代表。本集團亦會按舉報人的意願，在法規容許的情況下，採取合理的措施以保障舉報人的身份不會被公開。

如果有關舉報是誠實和／或建基於合理懷疑，舉報人會受到保護，免受不合理／不公平的紀律處分或對待。任何員工故意作出虛假或罔顧後果的指控，需接受紀律處分，包括終止聘用。

**(d) 合規性**

於報告年度，KVB及其員工沒有涉及關於貪污的法律檢控案件。



## V. COMMUNITY INVESTMENT

We believe that a sustainable business is dependent on the stability and well-being of the community and we support long-term community investment by encouraging our staff to actively participate in charitable activities. During the reporting year, we made donations to schools in the mainland China and various charitable organizations.

## V. 社區投資

我們相信可持續發展的業務有賴於社會穩定和福祉。我們鼓勵員工積極參與慈善活動，支持長期社區投資。在報告年度，我們資助了中國內地的學校教育事業和慈善機構。

## VI. SUSTAINABILITY TARGETS AND ACTIONS FOR 2017

In this report, we provide an outline of KVB's sustainability performance in the financial year of 2017 and set out our targets and action plan for the future.

## VI. 2017年可持續發展目標及行動

在本報告中，我們列出了2017財政年度KVB的可持續發展績效大綱，和訂立了未來的目標和行動計劃。

Programme/Target 計劃／目標	Focus 關注
To establish Sustainability Steering Committee with different focus groups 設立可持續發展督導委員會，當中包括不同關注小組	<ul style="list-style-type: none"> <li>» To enhance our compliance and best practices in various ESG subject areas 加強各ESG範疇的合規性和最佳常規</li> <li>» To setup key performance indicators for environmental subject area 建立環境保護的關鍵績效指標</li> <li>» To review emission data collection and reporting process 審視排放數據收集和報告過程</li> </ul>
To organize environmental protection training to employees 組織員工環境保護培訓	<ul style="list-style-type: none"> <li>» To improve our employees' awareness on environmental protection 提高員工的環境保護意識</li> </ul>
To review business travel policies and explore the possibility of any other effective alternatives 檢視外遊公幹政策和檢視其他替代方案的可行性	<ul style="list-style-type: none"> <li>» To reduce the frequency of unnecessary business trips and find alternatives to alleviate the environmental impact of our business travel policies 減省任何非必要的外遊公幹和尋找替代方案，降低對環境的影響</li> </ul>
To identify any suitable targets for increase of investment in the community 增加社區投資目標	<ul style="list-style-type: none"> <li>» To offer helping hands to the vulnerable ones 向有需要人士伸出援手</li> </ul>