

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2018

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TOTAL SOLUTIONS PROVIDER FOR ELECTRONIC GAMING EQUIPMENT IN MACAU AND ASIA

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Asia Pioneer Entertainment Holdings Limited A Environmental, Social, Governance Report 2018

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Scope and Reporting Period

This is the second Environmental, Social, and Governance (the "ESG") report by the Group, highlighting its ESG performance, with disclosure reference made to the ESG Reporting Guide as described in Appendix 20 of the GEM Listing Rules and Guidance set out by The Stock Exchange of Hong Kong Limited.

The Group is a total solutions provider of electronic gaming equipment ("EGES") for land-based casinos in the Macau Special Administrative Region ("Macau SAR") as well as other regions in Asia. EGE principally includes electronic table games ("ETGS") and electronic gaming machines ("EGMs" or "Slot Machines"). The Group's business can be segmented into: (i) technical sales and distribution of EGEs to land-based casinos; (ii) the repair of EGEs and sale of spare parts; (iii) consultancy to suppliers or manufacturers of EGE products to the casino gaming supplier market; (iv) sales of refurbished EGMs; and (v) the lease sales of EGEs.

This ESG report covers the Group's overall performance in two subject areas, namely, Environmental and Social of the business operations in Macau, including general office areas for general business operation, and workshop and warehouse areas for repairing and refurbishing services from 1 January 2018 to 31 December 2018, unless otherwise stated. The office was relocated due to business expansion during the Reporting Period.

Stakeholder Engagement and Materiality

The Group engages with key stakeholders such as board members, managers, supervisors, frontline workers, suppliers, and customers to understand their needs and concerns. The Group communicates with stakeholders via various communication channels such as by email, regular meetings, and quarterly board meetings.

In order to identify the most significant ESG aspects, the Group distributed quantitative surveys to stakeholders. Through the stakeholder surveys carried out during this Reporting Period, key material issues raised by the stakeholders mainly focused on the social aspects. Following topics have been deemed as the most important by stakeholders:

- Customer Privacy
- Development and Training
- Environmental Protection Measures
- Intellectual Property
- Responsible Gaming

The above aspects were strictly managed through the Group's policies and guidelines. The Group continues to invest in financial and non-financial resources to strengthen the management of above material topics. For instance, the relocation of its new office has enabled increased work efficiency and less environmental impacts with better resource allocation. The Group will continue to identify areas of improvement for the concerned aspects and keep close communication with its stakeholders to share and exchange ideas for advancing the Group's ESG management.

Stakeholders' Feedback

The Group welcomes stakeholders' feedback on the ESG approach and performance by giving suggestions or sharing views via email at ir@apemacau.com.

The Group's Sustainability Mission and Vision

Business sustainability is critical to the long-term trust that the Group has built with the public. The Group's engagement in electronic games can bring in several positive social and economic impacts for business partners. The Group purchases and sells used electronic gaming machine and provides electronic table gaming product, all of which can reduce waste and reduce wood consumption for the casinos. ETGs and EGMs can save man power costs and reduce risks that made by human in the casino. They can also reduce lead time for each game so that the casinos can increase their turnover.

The Group understands the importance of maintaining a good relationship with its suppliers, customers, employees and other stakeholders to meet its immediate and long-term goals. During the Reporting Period, there was no material and significant dispute between the Group and its suppliers, customers, employees and/or other stakeholders.

During the Reporting Period, the Group has received multiple benefits due to the relocation of the new office:

- contributing to less environmental impacts from using self-owned warehouse for storage purpose instead of renting extra space from outside, less product transportation was needed;
- enabling less reliance on personal vehicles as the new office location is within walk distance for many staff members;
- smoothing the internal communication as all departments are now working together in an open office layout; and
- facilitating team building and a more harmonic working environment by providing common areas for colleagues from different departments to interact and to use.

The Group has engaged with industrial partners, government agencies, customers, and other stakeholders to promote responsible gaming practices. The Group receives several awards and membership as a recognition of its contribution to society:

- Member of Macau Gaming Equipment Manufacturers Association (MGEMA);
- Construction Safety Card accredited by Labour Affairs Bureau (DSAL); and
- Gaming Inspection and Coordination Bureau (DICJ) License.

The Group is considering to form an ESG working group, consisting of representatives from various departments. It is believed that the working group will ensure that appropriate and effective ESG risk management and internal control system are in place. The working group will also further assist the current risk management and internal control systems, which are designed to meet the Group's specific business needs and to minimize its risk exposure.

A. Environmental

The Group is committed to the long-term sustainability of the environment and the communities in which it operates. Acting in an environmentally responsible manner, the Group endeavours to comply with the laws and regulations regarding environmental protection and adopt effective measures to achieve efficient use of resources, energy saving and waste reduction.

As a non-manufacturing company, the Group and its daily operation generate minor impacts on the natural environment. The Group does not produce wastewater, exhaust gas emissions and hazardous waste in daily operations. Indirect environmental impacts generated by the Group mainly included consumption of purchased electricity and other activities to support daily operation.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to air and greenhouse gas (GHG) emissions, discharges into water and land, and generation of hazardous and nonhazardous waste had been identified during the Reporting Period.

A1. Emissions

A1.1 Air Emissions

One passenger car and one private van were used for the daily business operation. Both were operated on gasoline. Their combustion generated several air emissions (non-GHG) include nitrogen oxides (NO₂), sulphur oxides (SO₂) and respiratory suspended particles (PM).

	Air emissions (non-GHG) from the vehicle		
Mobile fuel source	SO _x (kg)	NO _x (kg)	PM (kg)
Gasoline	0.09	1.85	0.22

Note: Emission factors for calculations on environmental parameters were made reference to Appendix 20 of the GEM Listing Rules and their referred documentation as set out by Hong Kong Exchanges and Clearing Limited, unless stated otherwise.

A1.2 Greenhouse Gas (GHG) Emissions

GHG emissions were generated directly from the consumption of mobile fuel (i.e. gasoline for groupowned vehicles). Indirect GHG emissions were also generated from the consumption of purchased electricity, processing of freshwater and sewage, landfilling of waste papers, and business air travel.

There were 116.87 tonnes of carbon dioxide equivalent (CO_{2eq}) GHG (mainly carbon dioxide, methane and nitrous oxide) emitted from the Group's operation during the Reporting Period. The overall intensity of the GHG emissions for the Group was 0.08 tCO_{2eq}/m2.

The GHG emissions reported included the following activities and scope:

- Direct (scope 1) GHG emissions from the consumption of gasoline;
- Energy indirect (scope 2) GHG emissions from purchased electricity;
- Other indirect (scope 3) GHG emissions from business air travel, municipal freshwater and sewage processing, and paper waste disposed at landfills.

Scope of GHG emissions	Emission sources	GHG Emission (in tCO _{2eq.})	Sub-total (in tCO _{2eq.})	Total GHG emission (in percentage)
Scope 1 Direct emissions	Combustion of fuel (gasoline) in mobile sources	15.74	15.74	13%
Scope 2 Energy indirect emissions	Purchased electricity	79.45	79.45	68%
Scope 3 Other indirect emissions	Paper waste disposed at landfills	1.47	21.68	19%
	Electricity used for processing fresh water and sewage by government departments/ third parties	0.16		
	Business air travel by employees	20.05		
Total		116.87	116.87	100%

Note: Emission factors for calculations on environmental parameters were made reference to Appendix 20 of the GEM Listing Rules and their referred documentation as set out by Hong Kong Exchanges and Clearing Limited, unless stated otherwise. Emission factor for purchased electricity in Macau was obtained from CEM Sustainability Report 2017.

A1.3 Hazardous Waste

The Group generated an approximate total of 10.15 tonnes of hazardous waste during the Reporting Period. Waste was generated from partnered casinos as well as from the Group's own office and warehouse.

Hazardous Waste Type	Annual disposal amount (kg)	Treatment of Waste
Used slot machines	10,000	Recycling major parts for second-hand machines project
Batteries	20	Government recycling bins
Cleaning products	20	Landfilling
Computer hardware	100	Landfilling
Lighting waste	10	Landfilling

A1.4 Non-hazardous Waste

The Group generated an approximate total of 1.1 tonnes of non-hazardous waste during the Reporting Period. Waste was generated from partnered casinos or other factories.

Non-hazardous Waste Type	Annual disposal amount (kg)	Treatment of Waste
Metal, glass, and plastic waste	300	Incineration or landfilling
Wooden machine box	200	Re-use for packaging purposes with the remaining landfilled
Hard-paper machine box	250	Re-use for packaging purposes
Buffering material	200	Re-use for packaging purposes
Plastic wrap	150	Re-use for packaging purposes

A1.5 Measures to Mitigate Emissions

To reduce emissions from vehicles, employees are encouraged to use public transport, such as delivery of documents to governmental department and local companies. When applicable, the Group encourages business partners to provide the e-invoice to reduce the usage of couriers.

For indirect emissions, the largest source of GHG emissions for the Group was due to purchased electricity, followed by employees' business air travel. Due to the business nature of the Group, frequent travels to domestic and overseas casinos are needed for service provided to clients. To reduce emissions related to business travel, the Group encourages to schedule regular meetings with business partners with conference calls when applicable.

A1.6 Wastes Reduction and Initiatives

The Group recycles waste to the maximum rate for resource saving. Whenever possible, the Group tries to reuse and recycle waste to achieve waste reduction and resource conservation. The used slot machines contain some hazardous materials such as heavy metals. The Group's engineers take out major components from machines, such as monitors, computer, bill acceptor and printer, which will be used for second-hand machines project.

During the Reporting Period, a total of 83 used slot machines were purchased from a Macau casino operator for refurbishment at the Group's integrated workshop and they were resold to an overseas buyer. By refurbishing used machines, the Group helps promoting overall waste reduction for the gambling industry, and it mutually brings economic benefits for the Group. The Group will also start installing recycling bins in the office in the next Reporting Period, enabling recycling of paper, plastic, cans and battery.

For daily operation, the Group encourages employees to reuse or recycle paper and continues to implement the following schemes to save paper:

- promoting electronic communication to reduce the use of paper;
- providing recycling boxes beside the photocopier, collecting used paper for potential reuse;
- adjusting printers to the double-sided setting, using double-sided printing and reusing paper for receiving facsimile;
- using recycled paper for photocopying;
- encouraging employees to reuse stationery, such as old envelopes and paper clips; and
- using e-cards (such as New Year cards, Christmas cards, etc.) for employees to use in festivals.

A2. Use of Resources

A2.1 Energy Consumption

Direct electricity consumption by the Group was 94,810 Kilowatt-hour (kWh). The total consumption of gasoline was 5,829.73 liters, which totalled at 53,136.39 kWh after conversion. The intensity for energy consumption (combining electricity and gasoline) was 105.18 kWh/m2.

A2.2 Water Consumption

The total water consumption for the Group was 261 m3, with an intensity of 0.19 m3/m2. Water was sourced from municipal tap water. No issues on sourcing water were reported during the Reporting Period.

A2.3 Energy Use Efficiency Initiatives

For the efficient use of energy, the Group chose energy-efficient central air conditioning (AC) system for the new office. The temperature is pre-set at 25°C during the cooling season. In winter, the AC is turned off when the temperature higher than 23°C. LED Lights have been installed in the new office. The temperature should be central control on 25°C for the air conditioner. In addition, the traditional check in and out machine using paper card was replaced by the electronic check in and out system.

The Group has also continued to promote energy-saving behaviours among employees focusing on various aspects, such as:

- turning off lights during low occupancy periods (such as lunch and non-office hours);
- turning off shared lighting such as those in the reception, corridors, lift hallways during lunchtime and irregular office hours;
- adopting flexible dressing code during summer to minimize air-conditioning usage;

- reducing day-lighting and heat absorption by using blinds and/or curtains.
- using standby or sleeping mode for personal computers
- turning off personal computers (including monitors and CPUs) after office hours
- switching off the power supply to the computer in the standby mode when not in use for long periods
- turning off unnecessary servers during non-office hours
- encouraging staff to reduce lift usage by using stairs

A2.4 Water Use Efficiency Initiatives

The Group continuously conserves water resources although the water usage is minimal or insignificant. For the efficient use of water, water-saving signage was placed next to each water throat which can remind our staff to conserve water.

A2.5 Packaging Material

A total amount of 0.40 tonnes of packaging materials were consumed during the Reporting Period. Packing materials used included plastic wrap, bubble film, sealing tape, carton and styrofoam. The staff often reuse packaging boxes for other packaging purposes.

Type of Packaging Material	Application of Packaging Material	Annual Consumption (kg)
Plastic Wrap	Machine Packing	171.60
Bubble Film	Machine Packing	74.00
Sealing Tape	Machine Packing & Office Relocation	32.20
Carton	Machine Packing & Office Relocation	105.64
Styrofoam	Machine Packing	14.00

A3. The Environment and Natural Resources

A3.1 Significant Impacts of Activities on the Environment

The Group's business activities do not generate major impacts on the environment. The Group did not receive any complaints from the surrounding community regarding air pollution, odor, noise, or other environmental pollution incidents during the Reporting Period. The Group will continuously monitor air emission, solid waste generation, wastewater discharge, and noise level to ensure the minimum impacts on the surrounding environment and to create a healthy environment for its workers.

B. Social

1. Employment and labour practices

The Group stringently complies with laws and regulations concerning employment and labour practices, such as the Macau Labour Relations Law. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare had been identified during the Reporting Period.

B1. Employment

The Employee's Handbook continues to serve as the guideline and working procedure to manage employment and labour-related practices. The Group ensures employees' benefits and welfare have been provided under applicable laws and regulations. Employees are entitled to paid annual leave, sick leave, marriage leave, maternity leave, paternity leave, injury leave, compensation leave and breastfeeding breaks.

The Group encourages lunch gathering, offers annual reunion dinner and teambuilding activities to strengthen employees' sense of belonging. The Group's working hour is from 10:00 to 18:00 and holiday package is following the Macau government Public Holidays (Decree Law No. 60/2000 on Public Holidays), more generous than the terms of Labour Relations Law. Other benefits include retirement benefit costs and short-term and other long-term employee benefits.

The Group has formed remuneration committee at the end of 2017. During 2018, the committee has been fully functioning, one meeting was held and, amongst other matters, reviewed and recommended to the Board for consideration certain remuneration-related matters of the directors and the senior management.

The Group does not have any forms of discrimination. Everyone is treated equally and respectfully. The Group also welcomes teammate to provide their suggestions freely. Any employee, regardless of his/her sex, nationality, marital status, disability and religious belief, is entitled to the same benefits and treatment being offered and applied to all other employees.

The Group had a total number of 39 employees as at 31 December 2018. The Group welcomes teammates from different nationalities. In 2018, The Group has employed staff from China (Hong Kong, Macau and Mainland) and Japan. For appraisal and promotion, it is solely based on the year-end evaluation of staff performance. The Group shares equally with all staff and welcome suggestions from everyone.

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Total Workforce by Gender



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Total Workforce by Geographical Region



A total of 15 employees resigned during the Reporting Period, leading to a turnover rate of 38% for the Group. The Group has implemented following initiatives to retain staff:

- Improve employee's benefits and welfare;
- Encourage effective communication with employees, to facilitate opinion sharing between team leaders and members;
- Establish different channels for staff to raise comments;
- Provide more opportunities for career and skills development and cultivate the sense of teamwork;
- Recognize the talent of employees and appoint them most suitable positions

Total Turnover Rate by Employment Category



Total Turnover Rate by Employment Type



Total Turnover Rate by Gender



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Total Turnover Rate by Age Group



Total Turnover Rate by Geographical Region



B2. Employee Health and Safety

The Group highly values the importance of providing a safe working environment for employees. Employees are familiar with fire safety and evacuation plan of the building. To allow the treatment for minor injuries, first aid boxes are available at readily accessible locations. The Group's new office has clear signage of the exit and equipped with emergency lighting, sprinkler system, fire extinguisher.

In addition, the Group clean the workplace on a daily basis and change the filters of air conditioners on a monthly basis to achieve a healthy indoor environment for the employees. The Group also installs fire extinguishers in the warehouse.

No work-related fatality or injury cases during the Reporting Period. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to providing a safe working environment and protecting employees from occupational hazards had been identified during the Reporting Period.

B3. Development and Training

The Group provides comprehensive career development and training to employees. Training needs were identified according to the training needs assessment, such as question papers, employee performance evaluations. Correspondingly, the Group arranges high-quality training for employees to satisfy training and development needs, to assist employees to prepare for various challenges during any business changes.

The Group also provides briefings to all Directors to develop and refresh their duties and responsibilities. All Directors are also encouraged to attend relevant training courses at the Group's expense with proof of training records.

The Group will consider establishing a formal Training and Development policy in the future.

B4. Labour Standards

The Human Resources Department continues to implement a comprehensive checking system during the recruitment process, as newly engaged employees are required to provide an identification document or Passport for the background check.

The Group strictly follows the Labour Law of Macau government. There were no major risks associated with incidents of child labour, forced or compulsory labour within the Group. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to preventing child and forced labor had been identified during the Reporting Period.

2. Operating Practices

B5. Supply Chain Management

The Group establishes a Policy Manual to detail the policies and procedures on purchases and payments, aiming to improve the transparency in decision making on all purchases and transactions. Before adding new suppliers, assessment is strictly carried out, internal evaluation forms such as Sample Request and Evaluation Report should be filled out. If new brand or machine is introduced, the Group will check if relevant supplier is listed on the Lists of Approved Manufacturers and Suppliers of Gaming Machines issued by the Gaming Inspection and Coordination Bureau. For engaged suppliers, the annual performance evaluation is performed to ensure the quality of goods and services provided are maintained at acceptable level.

During the Reporting Period, the Group engages with suppliers from multiple regions.

Region	Number of supplier(s)	Type of the suppliers
Slovenia	1	Supplying new slot machines, parts
Australia	1	Supplying new slot machines, parts
Taiwan	2	Supplying new slot machines, parts
America	1	Supplying printers, parts
China	1	Supplying parts
Macau	50	Supplying used slot machines, service, and parts

B6. Product Responsibility

Product Labelling, Health and Safety, and Advertising

Due to the business nature, product labelling, health and safety, and advertising issues are not applicable to the Group. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to health and safety, advertising, labeling and privacy matters relating to products and services provided had been identified during the Reporting Period.

Quality Assurance

The Group ensures Quality Assurance and Quality Control procedures are conducted for installation of machines. The Group has manuals and Standard Operating Procedures which the staff shall make reference to during daily operations. Experienced supervisor(s) need to monitor all working procedures onsite. Testing machines are also provided for staff for learning and practicing. As an EGEs distributor and service provider, there is no product recalls or service complaints due to health and safety reasons.

Data Protection

The Group respects personal data and is committed to compliance with the data protection principles and all relevant provisions of the Hong Kong Personal Data (Privacy) Ordinance and Personal Data Protection Act (Macau) and other applicable laws in regions where the Group operates.

The Group's IT General Control Policies and Procedures set out the data classification and corresponding protection measure to be taken. Three levels of data have been defined: 1) public, where data is generally open to the public; 2) internal, where data is "official use only"; and 3) restricted, where data is protected by regulations, company policies, and financial reports.

The Group's dedicated IT department monitors the hardware and software to ensure the stability of the network and run smoothly. Personal Computer Security is strictly monitored, for example, individual users shall not install any hardware on their PCs. It is a violation of security procedures to add or modify hardware such as RAM, processors, coprocessors, I/O boards or peripheral equipment without authorization of management. The Group has not received any complaints regarding breaches of customer privacy.

Intellectual Property

The Group Protects the Intellectual Property (IP) of itself and its business partners. The Group's registered business name (APE) is a registered Trade Mark (IP no. N/117032(002)).

B7. Anti-corruption

The Group has formulated a formal Anti-Bribery and Anti-Corruption Policy to maintain an ethical workplace environment. The policy sets out the responsibilities of those who work for the Group regarding observing and upholding zero-tolerance position on bribery and corruption. The Group's employees are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country the Group operates. The policy is applicable to all applicable stakeholders, including not only all employees (whether temporary, fixed-term, or permanent), but also consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with the Group.

The Group has a whistle-blowing system that states all employees can be whistle-blowers. The whistle-blowers should make their complaint to the line manager, the compliance manager, the director, or the Head of Governance and Legal. The Group ensures that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

The Group has not aided, abetted, assisted or colluded with an individual who has committed, or conspired to commit any unlawful activities. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to corruption, bribery, fraud and money laundering had been identified during the Reporting Period.

B8. Community Investment

The Group strives to implement corporate social responsibility and actively participates in public welfare activities and will consider formulating formal policies on community engagement in the near future. During the Reporting Period, the Group has actively sponsored and provided internship programs to local students, and the Group has actively responded the battle on environmental protection from Macau government, and has promoted activities such as encouraging staff to purchase mooncakes from NGO, recycle paper and battery. Specifically, the Group has engaged in the following activities during the Reporting Period:

Activities in 2018	Beneficiary/Collaborator/ Partnering organization	Detailed resources input
Internship Program 實習計劃	Macao Polytechnic Institute- BA in Gaming and Recreation Management 澳門理工學院工商管理學士學位 課程(博彩與娛樂管理專業)	Provided paid Internship job for 2 students to complete their academic credits
Caring Day for the retired greyhounds 退役格力犬關愛日	The Macau Canidrome Club 澳門逸園賽狗股份有限公司	3 staff attended the caring day to take care of the retired greyhounds for 12 hours in total
Orbis Mooncake Purchase 奧比斯愛心月餅	Orbis 奧比斯	Ordered 42 boxes of mooncake as gifts for staff, with a total value of HKD 1,629.60
Run of Hope 四季樂善行	Four Seasons Hotel 澳門四季酒店	8 staff and family members attended the run for 40 hours in total, donated HKD 4,074
Walks for Millions 公益金百萬行	Charity Fund from the Readers of Macao Daily News 澳門日報讀者公益基金會	9 staff attended the walk for 45 hours in total, donated HKD 2,910
Macao Daily 60th Anniversary Sponsorship 澳門日報創刊60週年慶典	Macao Daily 澳門日報	Provided sponsorship HKD 2,037
Click2Macau 10th Anniversary Sponsorship 捷點資訊報創刊10週年	Click2Macau 捷點資訊報	Provided sponsorship HKD 2,425
Business Awards of Macau 澳門商務大獎	Business Awards of Macau 澳門商務大獎	Provided sponsorship HKD 30,000
G2E Asia Awards 亞洲娛樂大獎	G2E Asia Awards 亞洲娛樂大獎	Provided sponsorship HKD 8,440

Activities in 2018	Beneficiary/Collaborator/ Partnering organization	Detailed resources input
Jumbo (G2E) Gala Dinner 尊博科技股份有限公司 亞洲娛樂展晚宴	Jumbo 尊博科技股份有限公司	Provided sponsorship HKD 50,000
The 6th Anniversary Dinner of Macau Gaming Equipment Manufacturers Association 澳門娛樂設備廠商會成立 6週年晚宴	Macau entertainment equipment manufacturers association 澳門娛樂設備廠商會	Provided sponsorship HKD 10,000
IAG Power 50 Gala Dinner 亞博匯50強晚宴	IAG 亞博匯	Provided sponsorship HKD5,064
Charity fundraising Fuhong Society of Macau	Fuhong Society of Macau 澳門扶康會	Provided donation MOP 2,000