



# Aurum Pacific (China) Group Limited 奧栢中國集團有限公司

(incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立的有限公司)

Stock Code 股份代號 : 8148



ENVIRONMENTAL, SOCIAL AND  
GOVERNANCE REPORT  
環境、社會及管治報告



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## ABOUT THE ESG REPORT

Aurum Pacific (China) Group Limited (the “Company”) and its subsidiaries (collectively referred to as the “Group”) is pleased to present the Environmental, Social and Governance (the “ESG”) report (the “ESG Report”) for the year ended 31 December 2018 (the “Reporting Period”). The ESG Report is prepared in compliance with the requirements of ESG Reporting Guide (the “ESG Reporting Guide”) as set out in Appendix 20 to the Rules Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) (the “GEM Listing Rules”).

The ESG Report intends to give an insight into the approach adopted and actions taken by the Company regarding its operations and sustainability that have significant implication for the Company and the interest to stakeholders. The Group believes sustainability is essential to the development of the Group’s long-term success. The Company understands the importance of the ESG Report and is committed to make continuous improvements in corporate social responsibility into its business in order to better meet the changing needs of an advancing society.

## SCOPE OF THE REPORT

The ESG Report covers the sustainability performance of our major business segments, namely software platform business in Hong Kong and Guangzhou of the People’s Republic of China (the “PRC”) and money lending business in Hong Kong. Our mobile gaming business is excluded from the scope of ESG Report for the Reporting Period due to changes of the sales strategy for this segment from self publishing to distributing particular game under licensing arrangement with well-established game operator for licensing income. In this regard, no environmental data would be generated from this business segment.

## 關於環境、社會及管治報告

奧栢中國集團有限公司(「本公司」)及其附屬公司(統稱「本集團」)欣然提交截至二零一八年十二月三十一日止年度(「報告期」)之環境、社會及管治(「環境、社會及管治」)報告(「環境、社會及管治報告」)。環境、社會及管治報告乃遵照香港聯合交易所有限公司(「聯交所」)GEM證券上市規則(「GEM上市規則」)附錄20所載環境、社會及管治報告指引(「環境、社會及管治報告指引」)之規定編製。

環境、社會及管治報告旨在載述本公司就其營運及可持續發展所採取之方法及措施，該等方法及措施對本公司及持份者利益深具意義。本集團相信可持續發展對本集團長遠成功發展至關重要。本公司明白環境、社會及管治報告之重要性，並致力於業務中持續改善企業社會責任，以因應社會的進步而作出轉變。

## 報告範圍

環境、社會及管治報告涵蓋本公司主要業務分部之可持續發展績效，即中華人民共和國(「中國」)香港及廣州之軟件平台業務及香港之放債業務。本報告期之環境、社會及管治報告範圍並不包括本公司之手機遊戲業務，原因為該分部之銷售策略從自行發行轉為根據授權安排向知名遊戲營運商分銷指定遊戲來賺取授權收入。因此，該業務分部不再產生任何環境數據。



The ESG Report is written in accordance with the ESG Reporting Guide under the GEM Listing Rules. Performance of the material sustainability issues were disclosed by virtue of the following reporting principles:

環境、社會及管治報告乃根據GEM上市規則項下環境、社會及管治報告指引編寫。重大可持續性議題之表現乃按以下報告原則披露：

Materiality 重要性	We disclose significant issues according to the areas and aspects identified as important in the materiality analysis, which was conducted by both management and stakeholders. 我們根據重要性分析中確定為重要之領域及範疇披露重大議題，重要性分析乃由管理層及持份者共同作出。
Quantitative 量化	We obtain environmental data to show the effectiveness of our ESG policies and performance. 我們獲取環境數據以顯示我們於環境、社會及管治政策之成效及表現。
Balance 平衡	We committed to present the ESG Report in an unbiased manner and not to conceal any unfavorable facts. 我們致力於以不偏不倚方式提交環境、社會及管治報告，且不隱瞞任何不利事實。
Consistency 一致性	We adopt consistent methodologies in calculating of key performance indicators. Disclosures will be made whenever methods or factors used has been changed. 本公司計算關鍵績效指標時採用一致方法。披露將會因應方法或因素有所變動時而作出。

For the details relating to corporate governance, please refer to the “Corporate Governance Report” in the Company’s annual report 2018.

有關企業管治詳情，請參閱本公司二零一八年年報「企業管治報告」一節。

## FEEDBACK

Your valuable opinions regarding our performance and reporting presentation form an integral part of our continuous improvement. Should you have any question or suggestion, please email us at [info@aurumpacific.com.hk](mailto:info@aurumpacific.com.hk) to help us to improve our ESG performance.

## 反饋

就本公司表現及報告呈列方式，閣下之寶貴意見將構成我們持續改進之重要一環。倘閣下有任何問題或建議，請發送電子郵件至 [info@aurumpacific.com.hk](mailto:info@aurumpacific.com.hk) 以助我們改善環境、社會及管治表現。



## STAKEHOLDER ENGAGEMENT AND MATERIALITY ASSESSMENT

The Group actively collects feedback from our stakeholders to maintain a high standard of sustainability of the Group. We strongly believe that our stakeholders play a crucial role for sustaining the success of our business in this challenging market. The Group connects with its stakeholders through communication channels as listed in the table below.

## 持份者參與及重要性評估

本集團積極向持份者收集意見，以維持本集團之高標準可持續發展。我們堅信於充滿挑戰之市場中，持份者為延續業務成功之關鍵角色。本集團通過下表所列溝通渠道與其持份者聯繫。

Stakeholders 持份者	Expectations and Concerns 期望及關注	Communication Channels 溝通渠道
<b>Stock Exchange</b> 聯交所	Compliance of the GEM Listing Rules, timely and accurate announcements 遵守GEM上市規則，及時準確發佈公佈	Seminar, workshops, website updates and announcements 專題討論、工作坊、網站更新及公佈
<b>Government and Regulatory Authorities</b> 政府及監管機關	Compliance with laws and regulations, preventing tax evasion, and social welfare 遵守法律及法規、防止逃稅及社會福利	Government inspections and email 政府檢察及電郵
<b>Shareholders</b> 股東	Return on investments, corporate governance, business strategies and performance 投資回報、企業管治、業務策略及表現	Regular general meetings, financial reports, circulars and announcements and Company website 定期股東大會、財務報告、通函及公佈及公司網站
<b>Employees</b> 僱員	Employee's compensation, rights and benefits, career developments, working environment and working hours 僱員薪酬、權利及福利、職業發展、工作環境及工時	Regular internal meetings and trainings, performance appraisal, email and employee handbooks 定期內部會議及培訓、績效評估、電郵及僱員手冊
<b>Customers</b> 客戶	Quality of products and services, handling time and privacy protection 產品及服務質量、處理時間及私隱保護	Meetings and on-site visits, customer service hotline and email 會議及實地考察、客戶服務熱線及電郵
<b>Suppliers</b> 供應商	Fair and open procurement and win-win cooperation 公平公開採購及雙贏合作	Meetings and on-site visits 會議及實地考察
<b>Community</b> 社區	Involvement in communities, social welfare and community development 社區參與、社會福利及社區發展	Donations and participating in community activities 捐款及參與社區活動

The Group identified issues for materiality assessment survey in accordance with the ESG Reporting Guide and engaged its stakeholders to conduct an online materiality assessment survey.

本集團根據環境、社會及管治報告指引識別重要性評估調查議題，並讓持份者參與線上重要性評估調查。



The following materiality matrix concludes the results regarding the materiality assessment survey. The top right-hand corner marks the ESG issues that concerned the stakeholders most. From the result it shows that the 5 most important ESG issues that concerned the stakeholders are Anti-Fraud and Corruption, Product Quality, Intellectual Property, Occupational Safety and Health and Diversification and Anti-Discriminatory. The results provided insight for the Group to prioritise the sustainability issues and strive for improvements in ESG performance so as to meet the expectations of our stakeholders.

下列重要性矩陣總結重要性評估調查結果。右上角標示持份者最為關注之環境、社會及管治議題。結果顯示，5項讓持份者關注之環境、社會及管治的最重要議題為反欺詐及貪腐、產品質量、知識產權、職業安全及健康以及多元化及反歧視。該等結果為本集團於可持續發展問題之優先排序提供深入見解，並有助於努力改善環境、社會及管治表現，以符合持份者期望。

### Materiality Matrix 重要性矩陣





## Quality of Work Environment

### 工作環境質量

- 1** Diversification and Anti-Discriminatory  
多元化及反歧視
- 2** Turnover Rate  
流失率
- 3** Occupational Safety and Health  
職業安全及健康
- 4** Training and Development  
培訓及發展
- 5** Child and Forced Labour  
童工及強迫勞動
- 6** Employment Relationship/Communication  
僱傭關係／溝通
- 7** Employee Benefits/Recreation  
僱員福利／康樂

## Operating Practices

### 營運常規

- 8** Supplier Selection Process  
供應商選擇程序
- 9** Anti-Fraud and Corruption  
反欺詐及貪污
- 10** Business Continuity Plan  
業務持續性計劃

## Product and Service Responsibility

### 產品及服務責任

- 11** Product Quality  
產品質量
- 12** Complaints Handling  
投訴處理

- 13** Intellectual Property  
知識產權
- 14** Customer Privacy  
客戶私隱
- 15** Research and Development  
研究與開發

## Community Contribution

### 社區貢獻

- 16** Participation in Volunteer Activities  
參與義工活動
- 17** Donations  
捐款

## Environmental Protection and Green Operation

### 環境保護及綠色營運

- 18** Sewage Disposal  
污水處理
- 19** Greenhouse Gas Emissions  
溫室氣體排放
- 20** Air Emissions  
空氣排放
- 21** Treatment of Hazardous and Non-Hazardous Wastes  
有害及無害廢物處理
- 22** Energy and Water Conservation  
能源和水資源保護
- 23** Natural Resources  
天然資源
- 24** Supplier Environmental and Social Assessment  
供應商環境及社會評估
- 25** Carbon Trading System  
碳交易系統

## OUR BUSINESS

The Group is committed to maintaining a high standard of corporate governance practices and transparency based on the interests of shareholders and various stakeholders. The Group will also strike a balance between development, social welfare and environmental protection. In the meantime, we will contribute to the community with our strengths and resources.

## 業務

本集團致力根據股東及各持份者之利益維持高標準之企業管治常規及透明度。本集團亦將於發展、社會福利及環保間取得平衡。與此同時，我們將以自身優勢及資源貢獻社區。



## EMPLOYMENT

The Group regards employees as one of the most valuable assets of the Group and treasures employee's talent through providing competitive salaries and benefits, offering employees continuous on-the-job training and creating a work-life balance working environment.

The Group has established human resources policies and procedures to set out the Group's standard of staff recruitment, remuneration, work periods, rest periods, as well as termination of employment and compensation matters. The human resources policies of the Group strictly adhere to the applicable employment laws and regulations in Hong Kong and the PRC, including but not limited to the Employment Ordinance (Chapter 57 of the Laws of Hong Kong), Labour Contract Law of the PRC (中華人民共和國勞動合同法), and Labour Law of the PRC (中華人民共和國勞動法). The Group is committed to comply with the laws and regulations in respect to the employee's social security schemes that are enforced by both Hong Kong and the PRC such as the Mandatory Provident Fund Schemes Ordinance (Chapter 485 of the Laws of Hong Kong), social insurance fund (endowment insurance, medical insurance, employment injury insurance, unemployment insurance and maternity insurance) and housing provident fund (五險一金) in the PRC. The human resources department of the Group reviews and updates the relevant policies from time to time in accordance with the latest laws and regulations.

Staff recruitment and promotion process is conducted in a transparent and open manner. The Group assesses candidates based on a wide range of factors including his/her academic records, past working experience, character and competence. Remunerations and benefits of the employees of the Group are determined with reference to the prevailing market standard as well as the candidate's performance. Moreover, the Group maintains a zero tolerance attitude toward any discrimination, such as those on the grounds of gender, age, marital status, family status, race, religion or disability, during recruitment process or any circumstances.

The Group regularly reviews the remuneration package and promotion opportunities by conducting regular performance appraisal for the staff and makes necessary adjustments to conform to the market standard in order to retain talents. In addition, the performance appraisal will be conducted through a two-way discussion process so as to enhance the objectivity of the assessment and ensure that all employees enjoy equal, fair and reasonable promotion opportunities.

## 僱傭

本集團視僱員為最寶貴資產之一，重視僱員才能，會提供具競爭力之薪金及福利、為僱員持續提供在職培訓以及創造工作與生活平衡之工作環境。

本集團已制訂人力資源政策及程序，以載列本集團員工招聘、薪酬、工作期、休息期以及終止僱傭及補償事宜之標準。本集團人力資源政策嚴格遵守香港及中國適用之僱傭法律及法規，包括但不限於僱傭條例(香港法例第57章)、中華人民共和國勞動合同法及中華人民共和國勞動法。本集團致力遵守香港及中國強制執行之僱員社會保障計劃法律及法規，例如強制性公積金計劃條例(香港法例第485章)、中國社會保險基金(養老保險、醫療保險、工傷保險、失業保險及懷孕保險)及住房公積金(五險一金)。本集團人力資源部根據最新法律及法規，不時審閱及更新相關政策。

員工招聘及晉升流程透明公開。本集團基於廣泛考量因素(包括彼等之學術成績、過往工作經驗、品格及能力)評估人選。本集團僱員之薪酬及福利參考當前市場狀況及候選人之表現釐定。此外，本集團於招聘流程中或任何情況下均絕不容許任何歧視，如性別、年齡、婚姻狀況、家庭狀況、種族、宗教或殘障歧視。

本集團藉由定期員工績效評估定期審閱薪酬組合及晉升機會，以及為留聘人才作出符合市場標準之調整。此外，績效評估將以雙方討論形式進行，務求提高評估之客觀性及確保所有僱員之晉升機會平等、公正及合理。





To increase the employees' sense of belonging, the Group offers various welfare incentives to employees, including medical insurance scheme, various paid leaves and various non-wage compensation. The Group also organized a series of activities for the employees for the Reporting Period such as annual dinner and Christmas party, etc.

During the Reporting Period, we did not aware of any violation with relevant laws and regulations relating to recruitment and promotion, compensation and dismissal, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare that have a significant impact on the Group.

## HEALTH AND SAFETY

The Group is committed to provide a safe and healthy working environment to its employee by implementing the following key measures:

- keeping a first-aid kit in the office;
- prohibiting smoking and drinking liquor in all enclosed areas within the offices;
- encouraging the staff to attend occupational health and safety training organized by external parties and organization; and
- encouraging the staff to attend fire drill organized by the property management company.

With the above measures, no work-related fatalities or instance of injury were recorded and the Group was not aware of any material non-compliance with the relevant laws and regulations such as Occupational Safety and Health Ordinance (Chapter 509 of the Laws of Hong Kong) and Labour Law of the PRC, that have a significant impact on the Group relating to providing a safe working environment and protecting employees from occupational hazards for the Reporting Period.

## DEVELOPMENT AND TRAINING

We regard talent development as an important part of the Group's development strategy. We aim to grow together with our employees and provide them with opportunities to improve themselves. We encourage our employees to work hard and to improve their professional qualities so as to prepare themselves for future challenges. We also set a clear career pathway to motivate our staff to improve themselves with continuous learning and training up talents so as to play the key roles in striving for the success of the Group. To encourage employees to enrich their personal knowledge and skill, the Group provides qualified employees with paid study and examination leaves.

為加強僱員歸屬感，本集團為僱員提供各種福利獎勵，包括醫療保險計劃及各類有薪假期以及不同的非工資補償。於報告期，本集團亦為僱員舉辦一系列活動，例如周年聚餐及聖誕派對等。

於報告期，我們並不知悉有任何關於違反招聘及晉升、補償及解僱、工時、休息期、平等機會、多元化、反歧視以及其他利益及福利的相關法律及法規，而對本集團構成重大影響。

## 健康與安全


本集團藉由實施以下主要措施，致力為僱員提供安全健康之工作環境：

- 於辦公室配備急救箱；
- 嚴禁在辦公室所有室內區域吸煙及飲酒；
- 鼓勵員工出席由外部人士或機構所舉辦之職業健康及安全培訓；及
- 鼓勵員工參與由物業管理公司安排之消防演習。

根據上述推行的措施，本集團於報告期內並沒有錄得任何因工傷亡的意外，本集團同時亦不知悉有任何重大不合規情況與職業安全及健康條例（香港法例第509章）及中國勞動法等法律及法規相關，而對本集團就提供安全工作環境及保障僱員免受職業傷害造成重大影響。

## 發展及培訓

我們視人才發展為本集團發展策略的重要一環。我們旨在與僱員共同成長及盡力為僱員提供多個機會自我增值。我們鼓勵僱員努力學習及提高其專業素質，為日後工作上之挑戰作好準備。我們亦為僱員打造清晰可見之晉升階梯，以激勵僱員持續進修學習自我增值及培訓出優秀人才，為本集團成功發揮關鍵作用。為鼓勵僱員增進個人知識及技能，本集團向合資格僱員提供有薪溫習及考試假期。



The Group encourages employees to participate in on-the-job training and continuing education to create opportunities for career development. Considering different position has different professional and technical needs, the Group ensures every new joiner receives proper orientation training and mentoring in order to help them to adapt the new working environment quickly. The Group also encourages employees to take designated job-related courses, programmes and professional qualification examinations so as to enhance their competitiveness and expand their capacity through continuous learning.

Moreover, the Group arranges directors and management to attend online training webcast, webinars and courses in relation to updates on the GEM Listing Rules, corporate governance, relevant laws and regulations so as to maintain their continuing professional development.

## LABOUR STANDARDS

The Group is committed to comply with laws and regulations including Employment Ordinance (Chapter 57 of the Laws of Hong Kong), Labour Law of the PRC (中華人民共和國勞動法), Prohibition of Child Labour of the PRC (中華人民共和國禁止使用童工規定), Protection of Minors Law of the PRC (中華人民共和國未成年人保護法) and other related labour laws and regulations in Hong Kong and the PRC to prohibit any child and/or forced labour employment. To combat against illegal employment on child labour, underage workers and forced labour, prior to confirmation of employment, the human resources department of the Group requires job applicants to provide valid identification documents and verify all the information to ensure the applicants meet relevant requirements. The human resources department is responsible for monitoring and ensuring compliance of all relevant laws and regulations that prohibit child labour and forced labour. If any illegal issue is found, their employment will be immediately terminated and we will notify the relevant government authorities timely.

During the Reporting Period, no non-compliance with the laws and regulations related to the prevention of child labour or forced labour had been found by the Group.

本集團鼓勵僱員參與在職培訓及持續進修為事業發展創造機會。考慮到不同職位有不同專業及技術需要，本集團確保每一名新員工均獲提供適當的入職培訓及指導以助彼等快速適應新工作環境。本集團亦鼓勵僱員參加指定工作相關課程、計劃及專業資格考試，以令僱員透過持續進修加強競爭力及提升工作能力。

此外，本集團安排董事及管理層參加有關GEM上市規則、企業管治以及相關法律及法規的更新資料的線上網絡直播、網絡研討會及課程等培訓，以維持董事之持續專業發展。

## 勞工準則

本集團致力於遵守法律及法規，包括僱傭條例（香港法例第57章）、中華人民共和國勞動法、中華人民共和國禁止使用童工規定、中華人民共和國未成年人保護法以及香港及中國的其他相關勞工法律及法規，禁止僱用任何童工及／或強迫勞工。為打擊非法僱用童工、未成年勞工及強迫勞工，本集團人力資源部於確認僱用前會要求應徵者提供有效身份證明文件及核實所有資料以確保申請者符合相關規定。人力資源部負責監察並確保遵守禁止童工及強迫勞工的所有相關法例及法規。倘發現任何違法情況，將即時解僱該等人士，且我們將適時通知相關政府部門。

於報告期，本集團並無發現有關違反防止童工或強迫勞工之相關法律及法規之情況。



## SUPPLY CHAIN MANAGEMENT

There is no major procurement involved in our money lending business, therefore, we will only focus on the software platform business. In selecting our suppliers, we will take into account of various factors including but not limited to their reputation, price, technical capabilities, business size and product quality by performing comprehensive assessment. We require our potential suppliers to comply with all the applicable laws and regulations and stick to their corporate ethics during operations. Given the stable and reliable relationship with current suppliers, the suppliers of our Group did not provide any unsatisfactory service during the Reporting Period.

## PRODUCT RESPONSIBILITY

### *Money Lending Business*

Due to our business nature, the Group could access to customers' personal or corporate sensitive information, therefore, ensuring the privacy of customer information is one of critical issues that the Group cares the most.

The Group recognizes the importance of compliance with regulatory requirements and has been granted a money lenders license by licensing court in Hong Kong pursuant to the Money Lenders Ordinance ("MLO") (Chapter 163 of the Laws of Hong Kong). The Group has established the money lending policies and procedure manuals which provides guidelines on handling and/or monitoring of money lending procedures. The Group also regularly monitors, reviews and, from time to time updates the existing policies to ensure money lending business is strictly in compliance with the MLO and other laws and regulations.

The Group has complied with the Six Data Protection Principles and the requirements of the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong) (the "PDPO") to ensure customers' privacy is strictly protected. The Group has established a safe and thorough customer data protection system to ensure its customer information is only used for its intended purpose and the following procedures are in place to prevent leakage of information, such as:

- customer data can only be accessed by the designated staff;
- no disclosure/distribution of customer information to a third party without authorization of the customer;
- requiring employees to sign the confidentiality agreement to acknowledge their responsibility to keep client information confidential;
- ensuring customer files are kept in a locked cabinet; and
- obstructions between office and commercial net were set to prevent unauthorised data use, exportation and copy.

## 供應鏈管理

我們之放債業務並無涉及重大採購，故此，我們將只關注軟件平台業務。於選擇供應商時，我們將透過全面評估，考慮多項因素，包括但不限於其聲譽、價格、技術能力、業務大小以及產品品質。我們要求潛在供應商遵守所有適用法律及法規，並在經營期間恪守企業道德。由於與現有供應商已建立穩定可靠的關係，故此本集團供應商於報告期並無提供任何未如理想之服務。

## 產品責任


### *放債業務*

基於我們之業務性質，本集團可接觸客戶之個人或企業敏感資料，因此，確保客戶資料私隱為本集團最熱切關注議題之一。

本集團深知遵守監管規定之重要性，並已根據香港法例第163章放債人條例(「放債人條例」)獲香港牌照法庭授予放債人牌照。本集團已制訂借貸政策及程序手冊，就處理及／或監管放債程序提供指引。本集團亦定期監察、檢討及不時更新現行政策，以確保放債業務嚴格遵守放債人條例以及其他法律及法規。

本集團遵守六項保障資料原則及香港法例第486章個人資料(私隱)條例(「個人資料(私隱)條例」)之規定，以確保嚴密保護客戶私隱。本集團已建立一套安全周詳之客戶資料保密系統，確保所獲客戶資料僅供其用作擬定用途，以及採取以下措施以防止資料洩漏，如：

- 只有指定員工方可取得客戶資料；
- 未經客戶授權，不得向第三方披露／發佈客戶資料；
- 要求僱員簽署保密協議以確認彼等有責任保密客戶資料；
- 確保客戶檔案保存於鎖櫃中；及
- 在辦公室及商業網絡之間設置阻隔以防止資料在未經授權下被使用、輸出及複製。



The Group has also committed to compliance with the advertising requirements. In addition to being true, accurate and unbiased, the information that the Group discloses should strictly comply with the relevant laws and regulations such as Hong Kong's Trade Description Ordinance. All kinds of advertisement on money lending business have to show a telephone hotline for the public to express their complaints, and a warning statement, "You have to repay your loans, don't pay any intermediaries". Prior to publication of advertisement, the final draft must be reviewed and approved by management and compliance personnel to make sure that no erroneous statements would be made.

### **Software Platform Business**

The Group provides communications software platform and software related services and engages in developing and marketing of patented server-based technology. The project team uses emails and telephone calls to maintain a smooth communication with its customers by assessing and reviewing the progress and to identify and resolve any problems which may arise during the ordinary course of business.

During the Reporting Period, the Group was not aware of any cases of non-compliance regarding health and safety, advertising, labelling and privacy matters relating to services provided as required by relevant laws and regulations. The Group also did not suffer any loss of customer arising from leakage of customer privacy or other service/product problems, nor received any material complaints and claims from customers due to inferior's service/product quality.

## **ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING**

To maintain a fair, ethical and efficient business and working environment, all staff and management of the Group are required to strictly comply with the Group's code of conduct in the staff handbook, especially those norms to regulate unethical behaviors, including but not limited to the following:

- prohibit employees from receiving gifts or benefits;
- prevent any conflict of interest; and
- prohibit employees from disclosing confidential information.

本集團亦已致力遵守廣告規定。本集團披露之資料除了屬真實正確及不偏不倚外，有關資料亦應嚴格遵守香港商品說明條例等相關法律及法規。所有放債業務廣告應顯示供公眾人士表達投訴之電話熱線，及「借錢梗要還，咪俾錢中介」之警告聲明。於刊登廣告前，最終草擬稿須經管理層及合規人員審閱及批准已確保不會有任何錯誤陳述。

### **軟件平台業務**

本集團提供通訊軟件平台、軟件相關服務及從事開發及營銷以伺服器為基礎之專利技術。項目團隊透過電郵及電話與客戶保持通信順暢，評估及審視進度以及識別及解決於日常業務過程中可能產生之任何問題。

於報告期，本集團沒有發現按相關法律法規規定，與提供服務之健康與安全、廣告、標籤及私隱問題的任何不合規事件。本集團亦無因洩露客戶私隱或其他服務／產品問題而流失任何客戶，亦無因服務／產品品質欠佳而接獲任何重大客戶投訴及索償。

## **反貪污及反洗錢**

為維持公平、道德及有效的業務及工作環境，本集團所有員工及管理層均須嚴格遵守本集團員工手冊之行為守則，尤其是規範不道德行為之有關慣例，包括但不限於以下各項：

- 禁止僱員收受禮物或利益；
- 防止任何利益衝突；及
- 禁止僱員披露保密資料。



For money lending business, to prevent and detect money laundering and terrorist financing, the Group follows the “Guideline on Compliance of Anti-Money Laundering and Counter-Terrorist Financing Requirements for Licensed Money Lenders” issued by the Companies Registry and has further strengthened its policies and manuals by specifying the procedures concerning customer due diligence, reporting of suspicious transactions, record-keeping and staff training, in order to provide the guidelines for the staff in preventing and detecting money laundering and terrorist financing. The Group’s policies and procedures in respect of prevention and detection of money laundering and terrorist financing activities include, but are not limited to, the following:

- carry out know-your-client procedures by verifying the applicant’s identity using reliable and independent source documents;
- check if the customer is (i) a politically exposed person as defined in the Anti-Money Laundering and Counter-Terrorist Financing Ordinance by conducting an online search; (ii) a person designated as terrorists by the Committees of the United Nations Security Council by cross checking with the terrorist list published on Joint Financial Intelligence Unit (“JFIU”) website; or (iii) from higher risk jurisdictions;
- the Group will report any suspicious transactions to JFIU in writing; and
- the Group maintains all essential information of our customers in accordance with PDPO.

Under the Group’s whistleblower policy, our employees may anonymously report any suspicious event of bribery and corruption verbally or in writing with full details and supporting evidence. The management will promptly conduct investigation against any suspicious or misconduct behavior to protect the Group’s interest. The Group advocates a confidentiality mechanism to protect the whistle-blowers against unfair dismissal or retaliation. A report will be issued to the relevant regulators or law enforcement authorities if criminality is suspected.

During the Reporting Period, the management did not receive any report from employees on any suspicious events. The Group was not aware of any non-compliance with relevant laws and regulations to bribery, extortion, fraud and money laundering that have a significant impact on the Group.

就放債業務而言，為防止及偵測洗錢及恐怖分子集資活動，本集團遵循公司註冊處發出之「持牌放債人遵從打擊洗錢及恐怖分子資金籌集規定的指引」，並進一步加強其政策及手冊，內容有關客戶盡職審查、報告可疑交易、保存記錄及員工培訓在內之程序，為員工提供防止及偵測洗錢及恐怖分子集資活動之指引。本集團防止及偵測洗錢及恐怖分子集資活動之政策及程序包括但不限於以下各項：

- 利用可靠獨立來源文件核實申請人身份，以執行客戶身份盡職調查程序；
- 查核客戶是否為(i)打擊洗錢及恐怖分子資金籌集條例所界定之政治風險人士；(ii)透過交叉查核聯合財富情報組(「聯合財富情報組」)網站公佈之恐怖分子名單，查核該人士是否為聯合國安全理事會委員會指定之恐怖分子人士；或(iii)來自較高風險司法權區；
- 本集團將以書面形式向聯合財富情報組報告任何可疑交易；及
- 本集團根據個人資料(私隱)條例存置所有客戶之重要資料。

根據本集團之舉報政策，僱員可以口頭或書面方式連同所有詳情及證明文件，匿名舉報任何可疑賄賂及貪污事件。管理層隨即就任何可疑或不當行為進行調查，以維護本集團利益。本集團提倡保密機制，旨在避免舉報者遭受不公平解僱或報復。倘涉及犯罪，則將向相關監管機構或執法單位發出報告。

於報告期，管理層並無接獲由僱員呈報之任何可疑事件。本集團並不知悉有任何有關賄賂、勒索、欺詐及洗黑錢法律及法規之不合規事宜，而對本集團造成重大影響。



## COMMUNITY INVOLVEMENT

The Group participates in community activities in order to fulfilling corporate social responsibility. During the Reporting Period, the Group made donation to support Hong Kong Buddhist Education Foundation Limited and Chinese Turkish Economic and Cultural Exchange Association Limited. The Group also co-organized an elderly visiting event with Neighborhood Advice-Action Council and our staff actively participated in this activity.

The Group will continue to encourage and support our staff to actively participate in the voluntary services at leisure times.

## ENVIRONMENTAL PROTECTION

With the growing global concern on the awareness of environmental protection and energy saving, the Group understands the importance on balancing the effort contributed to business operation and environmental protection. Therefore, we promote green operation and spread the concept of environmental protection among our employees. The Group has implemented a series of energy conservation and emission reduction measures in our daily operation to make contributions to the sustainable development.

During the Reporting Period, the Group was committed to comply with relevant laws and regulations relating to air and greenhouse gas (“GHG”) emissions, discharge into water and land, and generation of hazardous and non-hazardous waste. During the Reporting Period, the Group did not violate any environmental protection laws or regulations, nor was charged with any significant fines, non-monetary penalties and litigation relating to environmental protection. The relevant laws and regulations including but not limited to Waste Disposal Ordinance of Hong Kong and Environmental Protection Law of the PRC.

## AIR AND GREENHOUSE GAS EMISSIONS

We pay high attention to environmental protection in establishing a green corporation. To the best knowledge of the directors of the Company, the business of the Group did not produce any material impact to the environment and natural resources. The Group’s day-to-day business operations are mainly office-based. Our direct and indirect GHG emissions mainly come from the vehicles owned by the Group and electricity consumption respectively.

The Group owns several motor vehicles for business uses, which generate air emissions of sulfur oxides (“SOx”), nitrogen oxides (“NOx”) and particulate matter (“PM”). Among them, one is electric car, and the rest are running on unleaded automotive fuel. Moreover, all vehicles are under regular maintenance to enhance fuel consumption efficiency, ensure emission at a minimum level.

## 社區參與

本集團參與社區活動，以履行企業社會責任。於報告期，本集團捐款支持香港佛陀教育協會 (Hong Kong Buddhist Education Foundation Limited) 及中土經濟及文化交流協會 (Chinese Turkish Economic and Cultural Exchange Association Limited)。本集團亦與鄰舍輔導會共同組織探訪長者活動，我們的員工積極地參與該活動。

今後，本集團將鼓勵及支持我們員工於空餘時間積極參與義工服務。

## 環境保護

隨著全球日漸關注環境保護及節約能源，本集團深明於業務經營及環境保護之間努力取得平衡之重要性。因此，我們提倡綠色營運並向僱員宣揚環境保護概念。本集團已於日常營運推行一系列節能減排措施，旨在為可持續發展出一分力。

於報告期，本集團致力於遵守有關氣體及溫室氣體（「溫室氣體」）、向水及土地排放污染物及產生有害及無害廢棄物之相關法律及法規。於報告期，本集團並無違反任何環境保護法律或法規，亦無支付任何重大罰款、非貨幣處罰及有關環境保護之訴訟。相關法律及法規包括但不限於香港廢物處置條例及中華人民共和國環境保護法。

## 氣體及溫室氣體排放

我們十分關注環境保護，以建立綠色企業。據本公司董事所深知，本集團之業務並無產生對環境及自然資源造成任何重大影響。本集團日常業務經營以辦公室為主。我們之直接及間接溫室氣體排放主要分別來自本集團所擁有之汽車及耗電量。

本集團擁有若干汽車作業務用途，當中會產生一氧化硫（「一氧化硫」）、一氧化氮（「一氧化氮」）等氣體排放以及懸浮粒子（「懸浮粒子」）。其中，有一輛為電動車，其餘車輛則以無鉛汽油為燃料。再者，所有汽車均定期保養以提升燃耗效能，確保以最低限度排放。



		Unit 單位	2018 二零一八年
<b>Air emissions</b> 氣體排放			
NOx 一氧化氮		Kg 公斤	16.91
SOx 一氧化硫		Kg 公斤	0.16
PM 懸浮粒子		Kg 公斤	1.24
<b>GHG emissions</b> 溫室氣體排放			
Direct GHG emissions (Scope 1) 直接溫室氣體排放(範圍1)		Tonnes of CO <sub>2</sub> e 公噸二氧化碳當量	29.22
Indirect GHG emissions (Scope 2) 間接溫室氣體排放(範圍2)		Tonnes of CO <sub>2</sub> e 公噸二氧化碳當量	75.07
<b>Total GHG emissions (Scope 1 and Scope 2)</b> <b>總溫室氣體排放(範圍1及範圍2)</b>		Tonnes of CO <sub>2</sub> e 公噸二氧化碳當量	104.29
Direct GHG emissions (Scope 1) 直接溫室氣體排放(範圍1)		Tonnes of CO <sub>2</sub> e/employee* 公噸二氧化碳當量/僱員*	0.44
Indirect GHG emissions (Scope 2) 間接溫室氣體排放(範圍2)		Tonnes of CO <sub>2</sub> e/employee* 公噸二氧化碳當量/僱員*	1.14
<b>Total GHG emissions (Scope 1 and Scope 2)</b> <b>總溫室氣體排放(範圍1及範圍2)</b>		Tonnes of CO <sub>2</sub> e/employee* 公噸二氧化碳當量/僱員*	1.58

\* The number of staff at the year ended is adopted by the Company in calculating the intensity.

\* 本集團於計算密度時採用年末員工人數。

## USE OF RESOURCES

The Group is committed to upholding high environmental standards in order to promote environmental friendliness. The Group strives to minimize environmental impact by reducing energy and paper consumption and encouraging recycle of office supplies and other materials.

## 資源使用

本集團致力於維持高環保標準以宣揚環保意識。本集團透過減低使用能源及紙張耗用量並鼓勵回收辦公物資及其他材料以達至減輕對環境造成的影響。

Type of Resources 資源類別		Units 單位	2018 二零一八年
<b>Energy</b> 能源			
	Total energy consumption 能源消耗總量	MWh 兆瓦時	202.64
<i>Total energy consumption</i> 能源消耗總量		<i>MWh/employee*</i> 兆瓦時／僱員*	3.07
	Electricity 電力	MWh 兆瓦時	102.6
<i>Electricity consumption</i> 耗電量		<i>MWh/employee*</i> 兆瓦時／僱員*	1.55
	Unleaded petrol 無鉛汽油	MWh 兆瓦時	100.04
<i>Unleaded petrol consumption</i> 無鉛汽油之消耗量		<i>MWh/employee*</i> 兆瓦時／僱員*	1.52
<b>Water<sup>1</sup></b> 水 <sup>1</sup>			
	Water 水	m <sup>3</sup> 立方米	61.30
<i>Water consumption</i> 耗水量		<i>m<sup>3</sup>/employee*</i> 立方米／僱員*	8.76
<b>Paper</b> 紙張			
	Paper 紙張	Kg 千克	804.35
<i>Paper consumption</i> 紙張消耗量		<i>Kg/employee*</i> 千克／僱員*	12.19

\* The number of staff at the year ended is adopted by the Company in calculating the intensity.

\* 本公司於計算密度時採用年末員工人數。

<sup>1</sup> The management fee for the offices of the money lending business included the water consumption, which is paid by the property management company. As such, it is not feasible for the Group to obtain water consumption data of these offices. For the leased properties owned by the Group, the corresponding water usage is not included in the water consumption of the Group since the water consumption from the leased unit was borne by lessee. In addition, the water consumption and intensity for the offices of software platform business is immaterial that no disclosure of water consumption was made in the Reporting Period. The water consumption date represents the water consumption for the Guangzhou office of software platform business only.

放債業務辦公室之管理費已包括用水量，其費用由物業管理公司支付，因此本集團無法取得該等辦公室之用水量數據。就本集團擁有之租賃物業而言，相應用水量並不包括本集團耗水量，原因為租賃單位之用水量由租戶承擔。此外，軟件平台業務辦公室之用水量及耗水強度並不重大，故於報告期並無披露其用水量。用水量數據僅代表軟件平台業務辦事處位於廣州之用水量。





## Energy

The Group actively adopts the following electricity conservation and energy saving measures for promoting a low-carbon, energy-saving culture and reducing emissions:

- encourage employees to switch off IT devices, such as computers and monitors when not in use;
- setting the temperature of air-conditioners to an energy-efficient level, best at 25°C;
- use electricity-saving light bulbs;
- perform regular inspection and maintenance of office equipment such as air conditioners, computers, lights and distilled water dispenser to ensure they are operating efficiently;
- printing machine in the office is set at energy-saving mode by default, and the sleeping mode is automatically turned on; and
- priority for energy-efficient computer equipment and electronic office equipment with Grade 1 energy label in procurement.

## 能源

本集團積極採取以下節約能源措施，以宣揚低碳、節能文化及降低排放量：

- 鼓勵僱員關閉閒置電腦及顯示器等資訊科技設備；
- 將空調溫度設定至節能水平（最理想為 25°C）；
- 使用節能燈泡；
- 定期進行檢查及保養空調、電腦、電燈及蒸餾水機等辦公設備，確保該等設備有效運作；
- 辦公室打印機設置為節能模式，而睡眠模式則自動開啟；及
- 優先採購具一級能源效益標籤之電腦設備及電子辦公設備。

## Waste Management

As the principal businesses of the Group mainly focus on money lending business and software platform business, we do not involve any handling of the hazardous wastes or packaging material. The non-hazardous waste of the Group are mainly paper waste and waste generated from the daily operating activities in offices. The amount and intensity of non-hazardous waste generated and disposed of in the Reporting Period were 0.17 tonnes<sup>2</sup> and 2.60 Kg per employee<sup>2</sup>. In addition to the advocate of the concept of recycling, reuse or refill, the solid waste generated from the daily operating activities in offices is immaterial. Our waste management practice complies with laws and regulations relating to environmental protection. To minimize the production of paper waste, the following key procedures have been implemented:

- encourage both-sided printing as well as reuse of single side printed paper;
- place boxes and trays next to photocopiers to collect single-sided paper for reuse and recycling;
- encourage employees to use e-mails for material sharing; and
- discourage the use of disposable plastic or paper products such as plastic tablecloth, paper cups and paper plate.

With the implementation of the above measures, we believe that the objectives of saving energy, reducing waste and preserving the environment can be achieved.

## 廢物管理

由於本集團主要業務專注於放債業務及軟件平台業務，我們並不涉及處理任何有害廢物或包裝材料。本集團無害廢物主要為廢紙及辦公室日常營運所產生之廢物。於報告期內產生及處置的無害廢物數量及密度為0.17噸<sup>2</sup>及每名僱員2.60公斤<sup>2</sup>。除提倡回收、重用或再填充概念外，辦公室日常營運所產生的固體廢物並不重大。我們之廢物管理乃符合環保相關法律及法規。為減少產生廢紙，我們已實施下列主要程序：

- 鼓勵雙面印刷及重用單面印刷紙張；
- 於影印機旁放置箱及托盤並收集單面印刷紙張以作重用及回收；
- 鼓勵僱員以電郵作材料共享；及
- 不鼓勵使用膠枱布、紙杯及紙碟等即棄式塑膠或紙製產品。

藉由實施上述措施，我們相信可達致節能、減廢及環保之目標。

<sup>2</sup> It covers money lending business only.  
僅代表放債業務。



### **Water**

Our key water usage arises from consumption in office, including toilet flushing, tap water and drinking water. We encourage all staff to increase their awareness of conserving water by posting reminders at appropriate places.

### **ENVIRONMENT AND NATURAL RESOURCES**

The Group is not aware of any significant impact of its business activities on the environmental and natural resources. By taking the above-mentioned green initiatives on saving electricity, water, petrol and paper, the Group will continue our commitment in environmental protection.

### **水**

我們之用水量主要來自辦公室，包括沖廁水、自來水及飲用水。我們於適當位置張貼提示，藉此鼓勵全體員工提高彼等之節約用水理念。

### **環境及自然資源**

本集團並不知悉其業務活動對環境及自然資源造成任何重大影響。透過採取上述節約電力、水、石油及紙張之綠色措施，本集團將繼續致力保護環境。

