

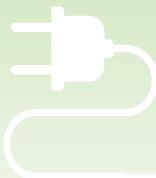
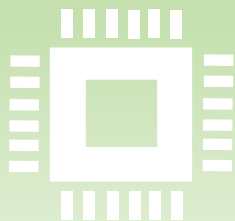
(Incorporated in the Cayman Islands with Limited Liability)

(於開曼群島註冊成立的有限公司)

Stock Code 股份代號 : 8148



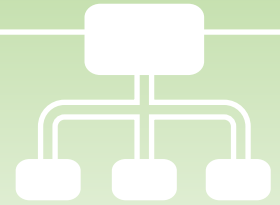
ENVIRONMENTAL, SOCIAL AND  
GOVERNANCE REPORT  
環境、社會及管治報告



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## ABOUT THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

This is the Environmental, Social and Governance (“ESG”) Report (the “ESG Report”) published by Aurum Pacific (China) Group Limited (the “Company”) to the stakeholders of the Company and its subsidiaries (collectively referred to as the “Group” or “we”), aiming to summarize the policies, measures and performance in relation to the sustainable development of the Group.

The Group is committed to create sustainable values for our stakeholders by continuously enhancing our business practices to reduce environmental impacts created from our daily operations. The Board of Directors (the “Board”) of the Company understands the importance in ensuring the effectiveness of the Group’s ESG related policies. Thus, we have integrated ESG aspects into its risk management and has taken corresponding measures in its daily operation and governance. The Group believes sustainability is essential to the development of the Group’s overall long-term success.

## REPORTING STANDARD, PERIOD AND SCOPE

The ESG Report is prepared in accordance with the Environmental, Social and Governance 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 describes the sustainability efforts made by the Group during the period from 1 January 2019 to 31 December 2019 (the “Reporting Period” or the “Year”).

By referring to the consultation conclusions issued by the Stock Exchange in December 2019, we acknowledged the revision which were made to the ESG Reporting Guide with updated topics such as introducing mandatory disclosure requirements and amending the environmental key performance indicators, etc. We aim to present the most updated information according to the Guide of the Stock Exchange and be able to acquire relevant data to gradually reach the expectations of the revised disclosure requirements.

## 關於環境、社會及管治報告

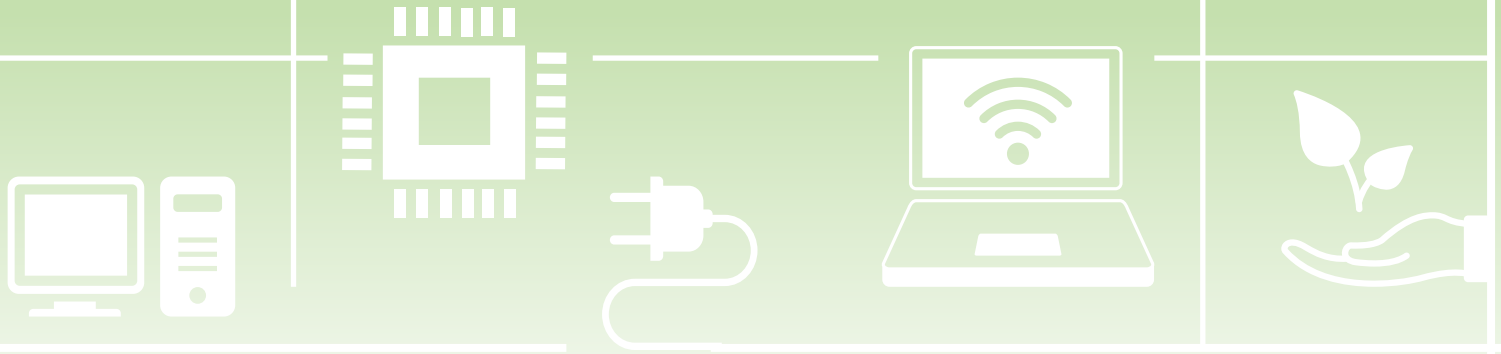
本報告是奧栢中國集團有限公司(「本公司」)向本公司及其附屬公司(統稱「本集團」或「我們」)持份者發表之環境、社會及管治(「環境、社會及管治」)報告(「環境、社會及管治報告」)，旨在概述本集團可持續發展之政策、措施及績效。

本集團致力持續強化我們的業務實踐，減少日常營運對環境的影響，為我們的持份者創造可持續發展價值。本公司董事會(「董事會」)明白確保本集團環境、社會及管治相關政策有效性的重要性。因此，我們已將環境、社會及管治層面納入風險管理，並在日常營運及管治中採取相應措施。本集團相信可持續發展對本集團整體長遠成功之發展尤為關鍵。

## 報告準則、期間及範圍

環境、社會及管治報告乃根據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所載之環境、社會及管治報告指引(「環境、社會及管治報告指引」)編製。環境、社會及管治報告闡述本集團於二零一九年一月一日至二零一九年十二月三十一日期間(「報告期」或「本年度」)之可持續發展工作。

經參考聯交所於二零一九年十二月發佈的諮詢意見總結，我們已確認環境、社會及管治報告指引採納之修訂，其中包括引入強制披露要求及修訂環境關鍵績效指標等更新內容。我們旨在根據聯交所指引呈列最新資訊，並獲取相關資料以逐步達到經修訂披露要求之預期。



The ESG Report focuses on our sustainability approach and performance in environmental and social aspects of our core business, namely (i) software platform business in Hong Kong and Guangzhou of the People's Republic of China (the "PRC"); and (ii) money lending business in Hong Kong. Our mobile games and applications business in Hong Kong is excluded from the ESG scope in the ESG Report, because of the changes of the sale strategy for this segment, from self publishing to licensing out the mobile games or related intellectual properties to various well-established game operators for licensing income since June of 2018. In this regard, no environmental data would be generated from this business segment.

## REPORTING PRINCIPLES

In preparing this ESG Report, the Group is based on the following four reporting principles as specified in the ESG Reporting Guide:

Materiality	Disclose the issues which have significant impacts of the Group on the economy, environment and society, or the scope of assessments and decisions of stakeholders being influenced.
重要性	披露本集團對經濟、環境及社會有重大影響之議題，或影響持份者評估及決定之範疇。
Quantitative	Disclose key performance indicators in a measurable way and ensure the Group's ESG policies and management systems are evaluated and explained in an effective manner.
量化	以可衡量之方式披露關鍵績效指標，以及確保以有效方式評估和闡明本集團之環境、社會及管治政策及管理體系。
Balance	Commit to present the ESG report regarding to its business operations of the Group in an objective manner, to reflect a comprehensive picture of the sustainability performance of the Group, including both positive and negative information.
平衡	承諾以客觀的方式呈列有關本集團業務經營之環境、社會及管治報告，全面反映本集團之可持續發展績效，包括正負面資訊。
Consistency	Adopt methods used in previous year(s), or state the revised reporting methods, or illustrate other relevant factors that will affect meaningful comparison.
一致性	採用上一年度採納之方法，或註明經修訂呈報方法，或說明將影響有意義對比之其他相關因素。

For the corporate governance practices of the Company, please refer to the "Corporate Governance Report" in the Company's annual report 2019.

## FEEDBACKS

We are convinced that the valuable opinions of our stakeholders are critical to the development of the Group. Should you have any question or suggestion, please email us at [info@aurumpacific.com.hk](mailto:info@aurumpacific.com.hk) to provide your opinions in improving the Group's ESG performance.

環境、社會及管治報告著重於本公司主要業務，即(i)中華人民共和國（「中國」）香港及廣州之軟件平台業務；及(ii)香港之放債業務在環境及社會方面之可持續發展方針及績效。本環境、社會及管治報告之環境、社會及管治範圍並不包括本公司香港手機遊戲及應用業務，原因為該分部之銷售策略自二零一八年六月起從自行發行轉為向多家具規模之遊戲營運商授出手機遊戲或相關知識產權來賺取授權收入。因此，該業務分部不再產生任何環境數據。

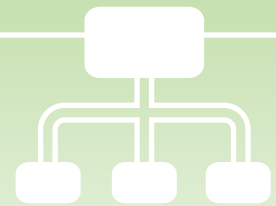
## 報告原則

本集團根據環境、社會及管治報告指引中規定之以下四項報告原則編製本環境、社會及管治報告：

有關本公司之企業管治常規，請參閱本公司的二零一九年年報所載之「企業管治報告」。

## 反饋

我們深信，持份者的寶貴意見對本集團之發展至關重要。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)，為改善本集團之環境、社會及管治表現提供意見。



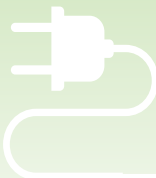
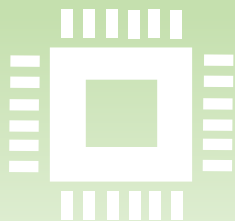
## COMMUNICATION WITH STAKEHOLDERS

The Group is committed to operate its business in a fair, responsible and transparent manner. In order to build up close communications with different types of stakeholders and understand areas of sustainability development which they are concerned with, communication channels were established to gather the opinions from stakeholders. The major stakeholders of the Group include:

## 與持份者溝通

本集團致力以公平、負責任及有透明度之方式經營業務。為與不同類型之持份者建立密切溝通，了解他們關注之可持續發展範疇，本集團已建立溝通渠道收集持份者之意見。本集團之主要持份者包括：

Stakeholders 持份者	Expectations and Requirements 期望及要求	Communication Channels 溝通渠道
<b>Stock Exchange, Government and Regulatory Authorities</b> 聯交所、政府及監管機構	<ul style="list-style-type: none"><li>➤ Compliance with laws and regulations 遵守法律及法規</li><li>➤ Comply with the GEM Listing Rules 遵守GEM上市規則</li><li>➤ Timely and accurate announcements 及時準確發佈公佈</li></ul>	<ul style="list-style-type: none"><li>➤ Government inspections 政府檢察</li><li>➤ E-mails 電郵</li><li>➤ Seminar 專題討論</li><li>➤ Website updates 網站更新</li><li>➤ Announcements 公佈</li></ul>
<b>Employees</b> 僱員	<ul style="list-style-type: none"><li>➤ Attractive employee's remuneration 有吸引力之僱員薪酬</li><li>➤ Rights and benefits 權利及福利</li><li>➤ Promote occupational health 推廣職業健康</li><li>➤ Career development and opportunities 職業發展及機遇</li><li>➤ Improve working environment 改善工作環境</li></ul>	<ul style="list-style-type: none"><li>➤ Regular internal meetings 定期內部會議</li><li>➤ Trainings and seminars 培訓及專題討論</li><li>➤ Performance appraisal 績效評估</li><li>➤ E-mails 電郵</li><li>➤ Employee handbooks 僱員手冊</li></ul>



#### Stakeholders 持份者

#### Expectations and Requirements 期望及要求

#### Communication Channels 溝通渠道

##### Shareholders and Investors 股東及投資者

- Return on investments  
投資回報
- Corporate governance  
企業管治
- Operate business in complying with laws and regulations  
依法合規經營業務
- Protect rights and interests  
保障權利及權益

- Company's website  
本公司網站
- Shareholders' meetings  
股東大會
- Financial reports, announcements and circulars and other publicly available information  
財務報告、公佈及通函以及其他公開資料

##### Suppliers and Partners 供應商及合作夥伴

- Fair and honest procurements  
公平誠實採購
- Achieve win-win cooperation  
達致雙贏合作

- Frequent communication via e-mails or telephone  
經常以電郵或電話保持通訊

##### Customers 客戶

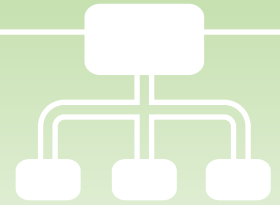
- High quality of products and services  
高質產品及服務
- Prompt handling time  
及時處理時間
- Safeguard sensitive customer information  
保障客戶敏感資料

- Meetings  
會議
- Site visit  
實地考察
- Customers service hotline and e-mails  
客戶服務熱線及電郵

##### Community 社區

- Involvement of community welfare  
社區福祉參與
- Increase the awareness of environmental protection  
提高環保意識
- Community development  
社區發展

- Donations and sponsorships  
捐款及贊助
- Take part in community activities  
參與社區活動



## MATERIALITY ASSESSMENT

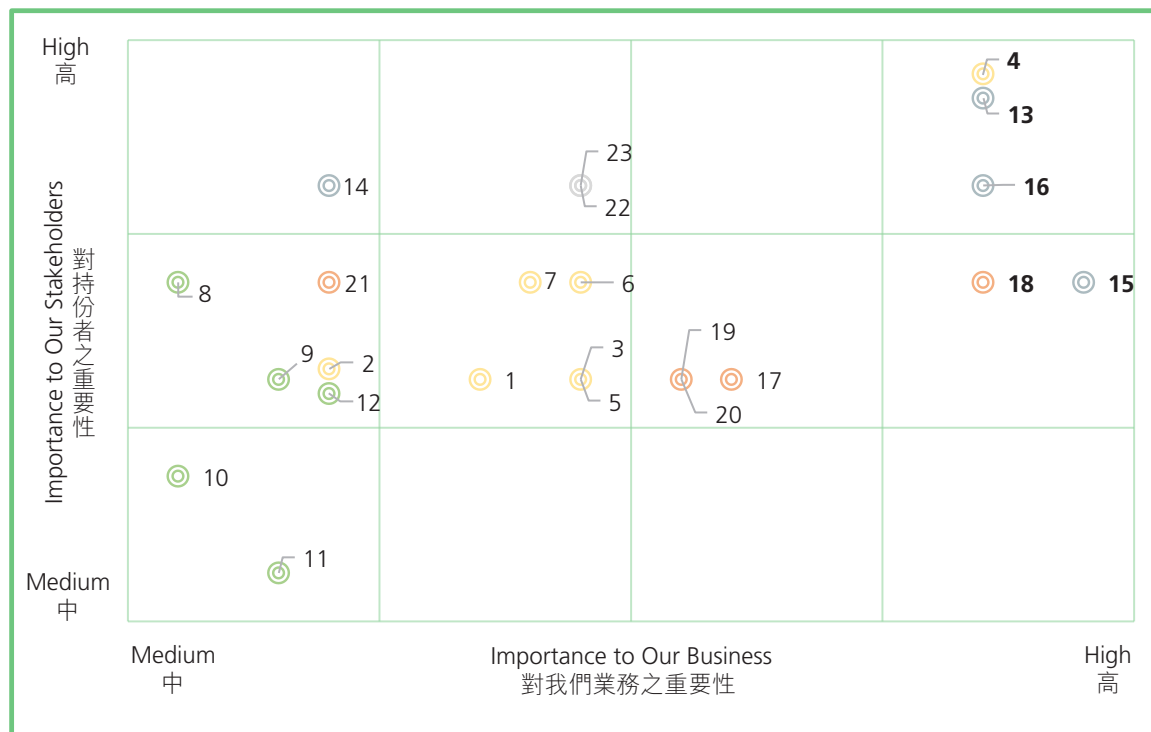
To identify material issues of our sustainable development, the Group has conducted a materiality assessment survey. This assessment set priority and sequence for issues identified through the survey and identified the areas of concern in relation to environmental and social issues of the Group and the stakeholders.

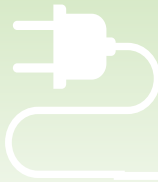
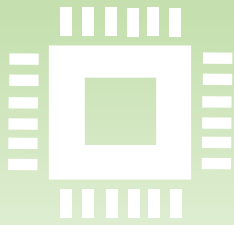
The survey results formulate the following materiality matrix.

## 重要性評估

本集團已進行重要性評估調查，以識別我們之可持續發展重大議題。該評估為調查中發現之議題進行優先排序，確立本集團及持份者關注之環境及社會議題。

調查結果制定了以下重要性矩陣。



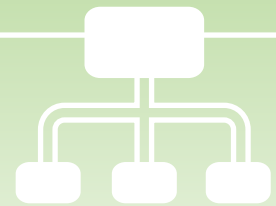


1	Protection of Employee Rights 保障僱員權利	13	Compliance in Operation and Management 營運及管理之合規性
2	Employment Policies 僱傭政策	14	Supply Chain Management 供應鏈管理
3	Employee Turnover 僱員流失	15	Anti-corruption 反貪污
4	Employee Occupational Safety and Health 僱員職業安全及健康	16	Disaster Contingency Management 災害應急管理
5	Employee Training and Development 僱員培訓及發展	17	Product/Service Safety and Quality 產品／服務安全及質量
6	Employee Remuneration Package and Benefits 僱員薪酬待遇及福利	18	Customer Satisfaction and Complaints Handling 客戶滿意度及投訴處理
7	Personal Data Privacy 個人資料私隱	19	Intellectual Property Rights 知識產權
8	Greenhouse Gas and Air Emissions 溫室氣體及空氣排放	20	Customer Data Privacy Protection 客戶資料私隱保障
9	Resource Management 資源管理	21	Product and Technology Development 產品及技術發展
10	Sewage Disposal 污水處理	22	Participation in Volunteer Activities 參與義工活動
11	Waste Management 廢物管理	23	Charity Donations 慈善捐款
12	Green Operation 綠色營運		

The indexes located on the top right-hand corner are the issues most concerned by the stakeholders and the Group, there are 5 ESG issues identified as material, they are highlighted in the matrix and listed below. The results provided insight for the Group to prioritize the sustainability issues and strive for improvements in ESG performance to meet the expectations of our stakeholders. Corresponding sections with the related issue discussed and explained are listed as follows:

右上角的指數是持份者及本集團最關注的議題，其中已確立五項重大的環境、社會及管治議題，該等議題已於矩陣凸顯及載列如下。有關結果有助本集團確定可持續發展議題之優先次序，致力改善環境、社會及管治表現，以符合持份者的期望。已討論及闡明之相關議題之相應章節載列如下：





## List of Important Categories

## 重要類別清單

### Material Issues

#### 重大議題

### Corresponding Sections/Units

#### 對應章節／單位

#### Employee Occupational Safety and Health

僱員職業安全及健康

#### Compliance in Operation and Management

營運及管理之合規性

- Occupational health and safety  
職業健康及安全
- Our employees  
我們的僱員
- Product responsibility  
產品責任
- Anti-corruption and anti-money laundering  
反貪污及反洗錢
- Supply chain management  
供應鏈管理
- Protecting our environment  
環境保護

#### Disaster Contingency Management

災害應急管理

- Occupational health and safety  
職業健康及安全

#### Anti-corruption

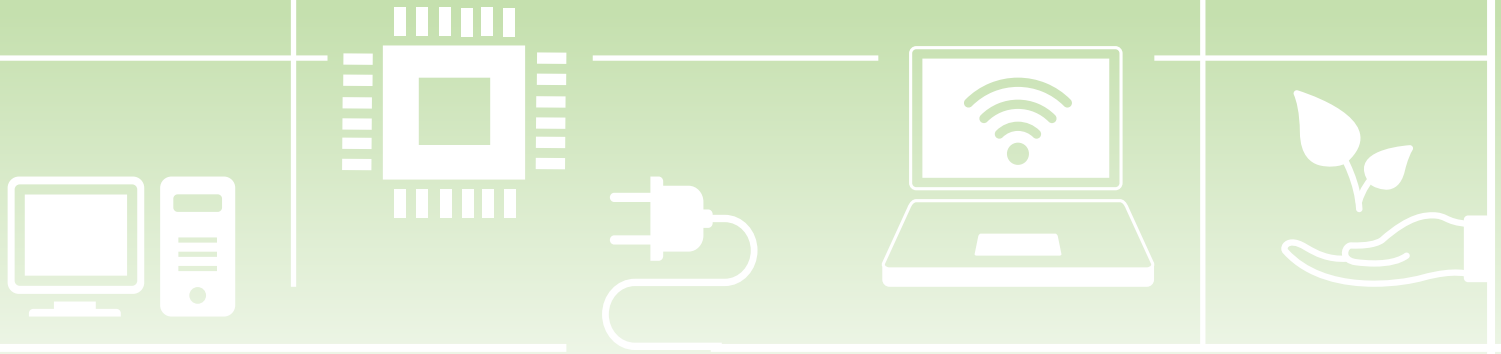
反貪污

- Anti-corruption and anti-money laundering  
反貪污及反洗錢

#### Customer Satisfaction and Complaints Handling

客戶滿意度及投訴處理

- Product responsibility  
產品責任



## OUR EMPLOYEES

### Employment

The Group values its employees and is committed to providing them with a fair and equitable working environment. Various policies and procedures are adopted by the Group with regards to employment, health and safety, development and training, and labour standards. Recruitment standard, remuneration, work periods, rest periods, as well as termination of employment and compensation matters are clearly stated in the Group's employee handbook.

All staff are required to comply with the employee handbook. The Group has taken reference from applicable labour laws and regulations to reassure that the established rules stated inside the handbook are complied with legal employment. The relevant labour laws and regulations include, but not limited to the followings:

- The Employment Ordinance (Chapter 57 of the Laws of Hong Kong);
- The Labour Law of the PRC;
- The Labour Contract Law of the PRC;
- The Mandatory Provident Fund Schemes Ordinance (Chapter 485 of the Laws of Hong Kong);
- Social Insurance Law of the PRC (basic old-age insurance, basic medical insurance, work injury insurance, unemployment insurance, maternity insurance and endowment insurance); and
- Regulations on the Management of Housing Provident Fund in the PRC.

### Remunerations and Benefits

A remuneration package provides various welfare according to the provisions of the abovementioned laws and regulations, aiming to attract and retain talents. Employees' salaries are mainly composed of salaries, bonuses and benefits.

To increase the employees' sense of belonging, the Group offers various welfare incentives to employees such as medical insurance scheme. The Group also provides employees with various paid leaves and various non-wage compensation. Furthermore, the Group organized a series of events for employees such as lunch gatherings for the celebration of Chinese New Year, Mid-Autumn Festival and Christmas, etc. These activities can strengthen the cohesion among employees and build up a positive corporate culture for the Group.

## 我們的僱員

### 僱傭

本集團重視僱員，致力為僱員提供公平公正之工作環境。本集團在僱傭、健康及安全、發展及培訓以及勞工標準方面採納各種政策及程序。本集團的僱員手冊中已明確規定招聘標準、薪酬、工作期、休息期以及終止僱傭及補償事宜。

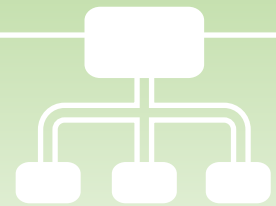
全體員工均必須遵守僱員手冊之規定。本集團已參考適用之勞工法律及法規，以確保僱員手冊既定規則符合合法僱用。相關勞工法律及法規包括但不限於以下項目：

- 僱傭條例（香港法例第57章）；
- 中國勞動法；
- 中國勞動合同法；
- 強制性公積金計劃條例（香港法例第485章）；
- 中國社會保險法（基本養老保險、基本醫療保險、工傷保險、失業保險、生育保險及兩全保險）；及
- 中國住房公積金管理條例。

### 薪酬及福利

薪酬待遇乃根據上述法律及法規之條文提供各種福利，旨在吸引及挽留人才。僱員薪金主要由薪金、獎金及福利組成。

為加強僱員歸屬感，本集團為僱員提供各種福利獎勵，如醫療保險計劃。本集團亦為僱員提供各種帶薪休假和非工資補償。此外，本集團為僱員舉辦一系列活動，例如歡慶農曆新年、中秋節及聖誕節等節日午間聚餐。該等活動有助提高僱員之間的凝聚力，為本集團建立積極正面之企業文化。



### **Promotion and Employee Recruitment**

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 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 appraisal assessment will be conducted through a two-way discussion process so as to enhance the objectivity of the assessment.

### **Equal Opportunity and Anti-Discrimination**

The Group is committed to be a fair opportunity employer. Our employment practices are diversified and do not discriminate on grounds of gender, disability, pregnancy, family status, race, colour, religion, age, sexual orientation, nationality, trade union membership or other factors.

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.

### **晉升及僱員招聘**

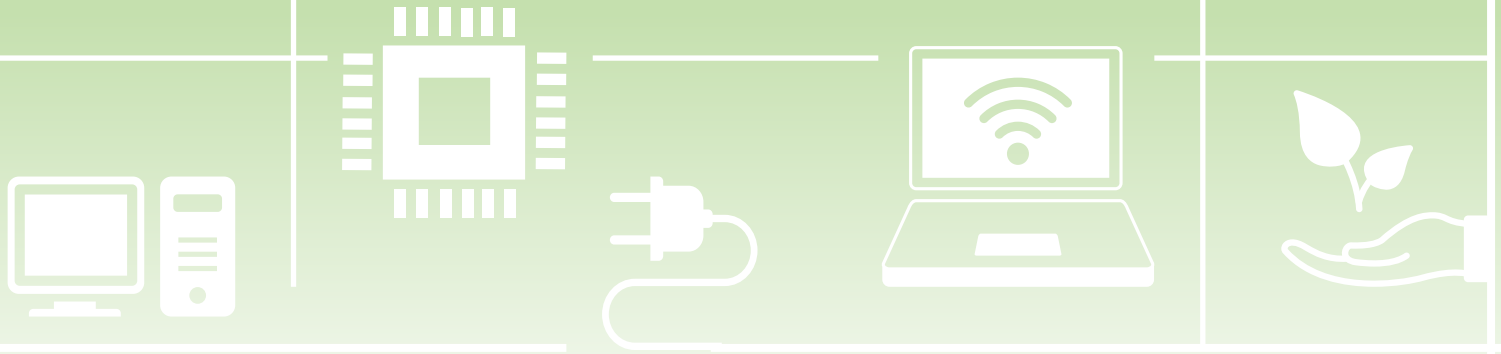
僱員招聘及晉升過程以富有透明度及公開的態度進行。本集團基於廣泛考量因素（包括彼等之學術成績、過往工作經驗、品格及能力）評估人選。本集團僱員之薪酬及福利參考當前市場狀況及候選人之表現釐定。此外，本集團於招聘過程中或任何情況下均絕不容許任何歧視，如性別、年齡、婚姻狀況、家庭狀況、種族、宗教或殘障歧視。

本集團藉由定期僱員績效評估定期審閱晉升機會，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。

### **平等機會及反歧視**

本集團致力成為提供公平機會之僱主。我們之僱傭方式多元化，概不存在基於性別、殘疾、懷孕、家庭狀況、種族、膚色、宗教、年齡、性取向、國籍、工會成員或其他因素之歧視。

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之相關法律及法規，而對本集團構成重大影響之情況。



### **Occupational Health and Safety**

The Group's business did not involve in any harmful procedures or processes, employees are stationed in office that the risk to physical health and safety is not a significant concern for the Company. Nonetheless, the Group provides a health and safety workplace to its employee by implementing the following key measures:

- Employees are encouraged to attend fire drill held by the property management company;
- No smoking and drinking liquor are allowed in all indoor areas inside the offices;
- Employees are encouraged to attend occupational health and safety training; and
- First-aid kits are kept inside the offices.

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**

The Group recognizes the importance of the continuity and development of the employees. Growing together with its employees and provide them with opportunities to improve themselves is an important goal to the Group.

The Group believes that expertise of its employees is the crucial factor to its business success. Nowadays, the market trends change constantly. Employees are expected to enrich their knowledge and improve their skills and abilities in order to remain competitive in the market. Therefore, the Group provides eligible employees with paid study and examination leaves.

### **職業健康及安全**

本集團業務並不涉及任何有害程序或過程，僱員在辦公室工作，故對身體健康及安全之風險並非本公司之重大關注事項。儘管如此，本集團藉由實施以下主要措施，致力為僱員提供健康安全之工作環境：

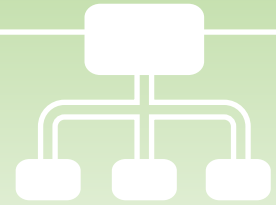
- 呼籲僱員參與由物業管理公司安排之消防演習；
- 嚴禁在辦公室所有室內區域吸煙及飲酒；
- 鼓勵僱員出席職業健康及安全培訓；及
- 於辦公室配備急救箱。

根據上述推行之措施，於報告期，本集團概無錄得任何因工傷亡的意外，本集團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**

本集團認識到僱員連續性及發展之重要性。本集團重視與僱員共同成長，為僱員提供自我增值機會。

本集團認為，僱員之專業知識是企業成功之關鍵因素。現今市場之趨勢不斷變化。為保持市場競爭力，僱員需要不斷豐富自己的知識，提高技能及能力。因此，本集團向合資格僱員提供有薪進修及考試假期。



The Group encourages employees to participate in on-the-job training and continuous education to get familiar with their job posts. In addition, the Group also encourages employees to take designated job-related courses and programs to enhance their competitiveness and broaden their horizon.

Furthermore, the Group arranged trainings to the directors and management, through webcast, webinars and courses in relation to updates on the GEM Listing Rules, corporate governance and other relevant laws and regulations in order to maintain continuing professional development.

### **Labour Standards**

The Group is committed to follow strictly of the laws and regulations including Employment Ordinance (Chapter 57 of the Laws of Hong Kong), Labour Law of the PRC, Prohibition of Child Labour of the PRC, Protection of Minors Law of the PRC and other related labour laws and regulations in Hong Kong and the PRC to prohibit any child and/or forced labour employment. These laws and regulations are set up to prohibit child and forced labour within the Group. At the first line of defence, all newly recruited employees are required to provide valid identification documents to ensure no under-age labour is employed. If any illegal issues are discovered, the Group will immediately terminate the employment and report to the relevant government authorities in a timely manner.

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

### **PRODUCT RESPONSIBILITY**

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.

本集團鼓勵僱員參與在職培訓及持續學習，以熟諳自己之職務。此外，本集團亦鼓勵僱員參加指定工作相關課程及計劃，以加強競爭力及擴闊視野。

此外，本集團安排董事及管理層參加有關GEM上市規則、企業管治以及其他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，以維持持續專業發展。

### **勞工準則**

本集團致力嚴格遵守法律及法規，包括僱傭條例（香港法例第57章）、中國勞動法、中國禁止使用童工規定、中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。制定該等法律及法規旨在禁止在本集團內使用童工及強迫勞工。作為第一道防線，所有新入職僱員均須提供有效身份證明文件，以確保概無僱用未成年勞工。倘發現任何違法事宜，本集團將即時終止僱傭，並適時通知相關政府部門。

於報告期，本集團概無發現按相關法律及法規，與防止童工或強迫勞工有關之重大違規情況。

### **產品責任**

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。



### **Data Privacy Protection**

Being a service provider of money lending services, the Group could access to significant corporate or customers' personal information. Therefore, ensuring the privacy of clients' data is one of the critical issues to the Group.

During the Reporting Period, the Group was in stringent compliance 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 was protected in a careful manner and information received was only for its intended purposes. The following procedures has been implemented to prevent leakage of customers' information, such as:

- Only designated employees can have access to the clients' data;
- No disclosure of customer information to any third party without the approval from the customers;
- Requiring employees to sign a confidentiality agreement to acknowledge their responsibilities to keep clients' information confidential;
- Separation between the usage of office and commercial network has been set; and
- Ensuring customer files are kept in a locked cabinet.

On the other hand, 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.

The Group was not aware of any non-compliance with relevant laws and regulations that have a significant impact to the Group relating to data privacy protection during the Reporting Period.

### **資料私隱保障**

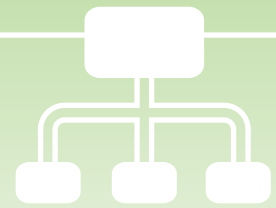
本集團為一家放債服務提供商，會接觸大量公司或客戶之個人資訊。因此，保障客戶資料私隱是本集團之重要事宜。

於報告期，本集團嚴格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，以確保嚴密保障客戶私隱，而收到的資料僅供用作擬定用途。本公司已採取以下措施以防止客戶資料洩漏：

- 僅指定的僱員才可存取客戶資料；
- 未經客戶授權，不得向任何第三方披露客戶資料；
- 要求僱員簽署保密協議以確認彼等有責任保密客戶資料；
- 在辦公室及商業網絡之間已設置阻隔；及
- 確保客戶檔案保存於鎖櫃中。

另外，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，本集團概無發現任何關於違反資料私隱保障之相關法律法規，而對本集團造成重大影響之情況。



### Advertising

The Group is also committed to comply with “Guidelines on Additional Licensing Conditions of Money Lenders License” issued by Companies Registry. Information that has been disclosed by the Group is required to be factual, accurate and unbiased, which should strictly comply with the relevant laws and regulations. All of the advertisements related to the money lending business must contain telephone hotline for handling complaints from clients. Also, a risk warning statement, “You have to repay your loans. Don’t pay any intermediaries” must be included in the Group’s advertisements. Before the publication of advertisement, the final draft must be reviewed and approved by the management to avoid misleading statements.

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.

During the Reporting Period, no material non-compliance regarding health and safety, advertising, labelling and privacy matters relating to services provided as required by relevant laws and regulations have been found. The Group was not aware of any loss of information leakage of customer privacy or other service/product problems, nor received any material complaints and claims from customers due to quality of the service/product.

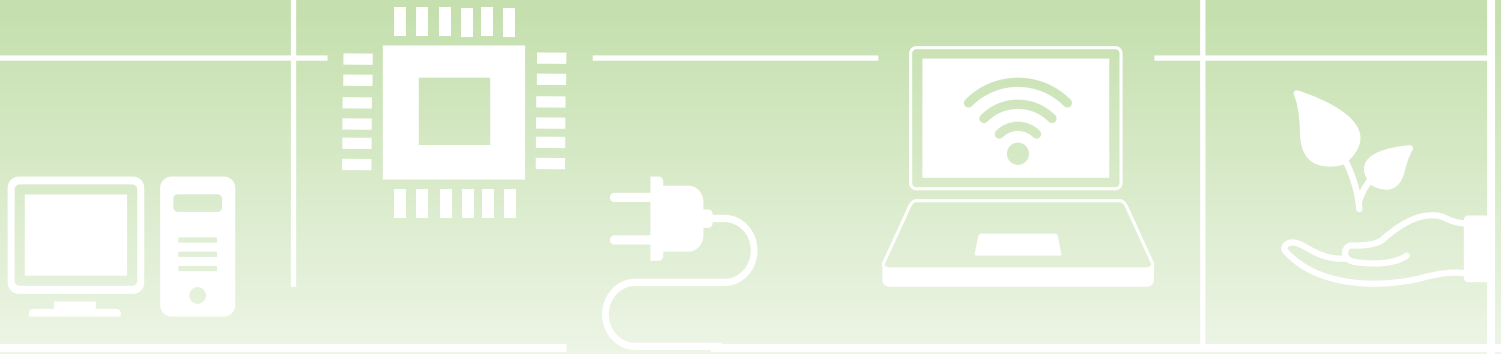
### 廣告

本集團亦承諾遵循公司註冊處發出之「放債人牌照的額外牌照條件」。本集團所披露的資料必須真實、準確、公正，並應嚴格遵守相關法律及法規。所有與放債業務相關的廣告必須包含處理客戶投訴之熱線電話。本集團廣告中亦必須有「借錢梗要還，咪俾錢中介」的風險提示字句。廣告發佈前，最終版本必須經管理層審核及批准，以避免出現誤導性陳述。

本集團明白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」）獲香港牌照法庭發出放債人牌照。本集團已制訂放債政策及程序手冊，就處理及／或監察放債程序提供指引。本集團亦定期監察、檢討及不時更新現有政策，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。

於報告期，本集團概無發現按相關法律法規的規定，與提供服務之健康與安全、廣告、標籤及私隱問題有關的任何重大不合規事件。本集團並不知悉有任何客戶私隱資料洩露或其他服務／產品問題，亦並無收到客戶因服務／產品品質問題而提出的重大投訴及索償。





## ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

To embrace business integrity, the Group does not tolerate any forms of corruption, including bribery, extortion, fraud and money laundering. In order to prevent corruption, all employees and management of the Group are required to strictly abide with the Employee Code of Conduct mentioned in the Employee Handbook, especially norms to regulate unethical behaviors, including but not limited to the following:

- Employees shall not receive any benefits that are beyond common business hospitality, or without prior approval from head of department or chief executive;
- No offering of bribes is allowed to retain or obtain business;
- Employees should avoid involving in conflict of interests; and
- Employees should make a full disclosure for potential conflict to the management immediately.

For money lending business, the Group must follow “Guideline on Compliance of Anti-Money Laundering and Counter-Terrorist Financing Requirements for Licensed Money Lenders” issued by the Company Registry in order to prevent and detect money laundering and terrorist financing. In response to the policy, the Group has further reinforced its policies and manuals to specify the procedures customer due diligence, reporting of suspicious transactions, record-keeping and employee training, in order to provide the guidelines for the employee in preventing and detecting money laundering and terrorist financing.

The whistleblowing policy provides a guidance for employees to report any misconduct or malpractice including corruption within the Group. Whistleblowers may anonymously report any suspicious event of corruption to their senior management 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. As part of the Group’s commitments to protecting whistle-blowers from detriment, harassment and retaliation, the identity of whistle-blowers will be kept confidential without their prior consent unless it is a legal obligation to reveal their identities to the authorities.

## 反貪污及反洗錢

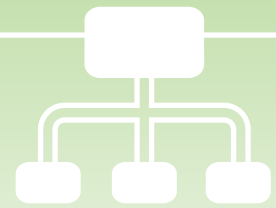
為體現商業誠信，本集團絕不容忍任何形式的貪污行為，包括賄賂、勒索、欺詐及洗黑錢。為防止貪污，本集團所有僱員及管理層均須嚴格遵守僱員手冊之僱員行為準則，尤其是不道德行為之規範，包括但不限於以下事項：

- 僱員不得收受一般業務招待以外的福利待遇，或未經部門主管或主要行政人員事先批准，不得擅自收受福利待遇；
- 不得行賄以保留或獲取業務；
- 僱員應避免涉及利益衝突；及
- 僱員應立即向管理層全面披露可能存在的衝突。

就放債業務而言，為防止及偵測洗錢及恐怖分子集資活動，本集團須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」。為配合有關政策，本集團已進一步加強其政策及手冊，列明客戶盡職審查、報告可疑交易、保存記錄及僱員培訓在內之程序，為僱員提供防止及偵測洗錢及恐怖分子集資活動之指引。

舉報政策為僱員提供舉報本集團內任何不當或瀆職行為（包括貪污）之指引。舉報者可以口頭或書面方式連同所有詳情及證據，向高級管理層匿名舉報任何可疑貪污事件。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。本集團承諾保護舉報者不受傷害、騷擾及報復，除非有法律義務向當局披露舉報者身份，否則未經舉報者事先同意，舉報者的身份將被保密。





During the Reporting Period, the management did not receive any suspicious events reported by employees. The Group was not in breach of any relevant laws and regulations in the matter related to bribery, extortion, fraud and money laundering.

## SUPPLY CHAIN MANAGEMENT

As no procurement is involved in our money lending business, the Group's main suppliers come from the software platform business.

For a new supplier, an all-rounded assessment will be conducted to shortlist suitable suppliers. The selection criteria include their reputation, quality of products, business size, technical capabilities, compliance with laws and regulations, payment terms, delivery and after-sale services before the Group makes the decision on which supplier to go for business with. In addition, we require our potential suppliers to comply with all the applicable laws and regulations and stick to their corporate ethics during operations. During the Year, the Group maintained a stable and reliable relationship with current suppliers, therefore, the suppliers of the Group did not provide any unsatisfactory service.

During the Reporting Period, no material breach of the relevant environmental laws and regulations by any of the suppliers the Group engaged have been found. In addition, no significant environmental and social risks in the provision of their services under the respective procurement contracts have been found.

## COMMUNITY INVESTMENT

Being a socially responsible enterprise, the Group actively present a positive image in the communities where it operates. Maintaining close communication and interaction with the local communities and contribute to the development of these communities is a goal of the Group. Employees are also encouraged to participate voluntarily in various local community activities and events in their leisure time. During the Reporting Period, our employees have participated in the "Home Optimization Program" hosted by the Build & Wish Voluntary Team in improving the living environment of families with needs.

於報告期，管理層並無接獲由僱員呈報之任何可疑事件。本集團概無違反任何有關賄賂、勒索、欺詐及洗黑錢之相關法律及法規。

## 供應鏈管理

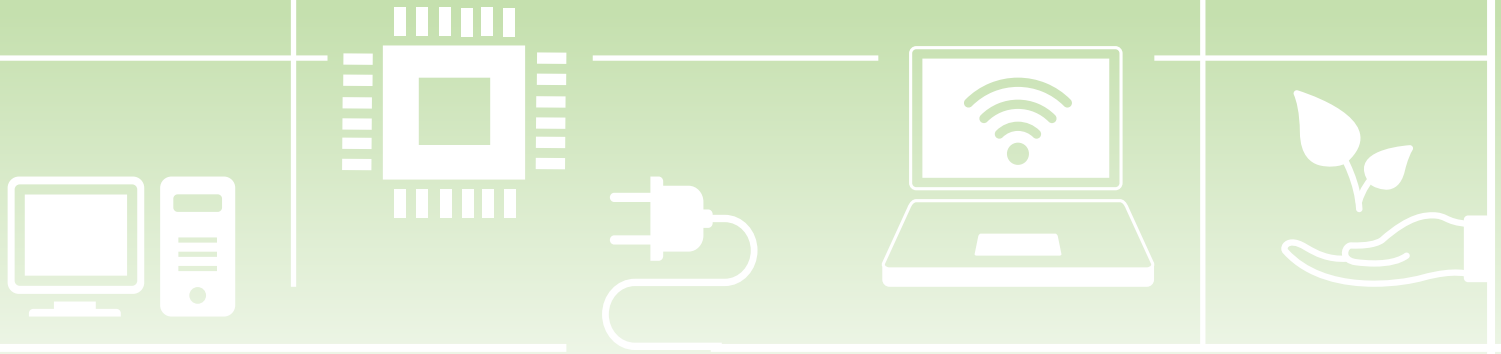
由於我們之放債業務並無涉及採購，故本集團之主要供應商均來自軟件平台業務。

本集團將針對新供應商進行全面評估，以甄選合適的供應商。本集團決定與供應商合作前將考慮甄選標準，包括供應商的信譽、產品品質、業務大小、技術能力、依法合規、支付條款、交付及售後服務。此外，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。於本年度，由於本集團與現有供應商已建立穩定可靠的關係，故此本集團供應商並無提供任何未如理想之服務。

於報告期，概無發現本集團委聘的供應商有重大違反相關環保法律及法規的情況。此外，概無發現其根據相關採購合約提供服務時存在重大環境及社會風險。

## 社區投資

本集團為一家有社會責任感之企業，積極在經營所在社區樹立正面形象。本集團目標為與當地社區保持密切的溝通和互動，並為社區發展做出貢獻。本集團亦鼓勵僱員在業餘時間自發參與當地社區的各種活動及項目。於報告期，我們的僱員已參與由建。祝義工隊主辦的「優化家居項目」，以改善有需要家庭的生活環境。



## PROTECTING OUR ENVIRONMENT

Given that the increase awareness about how climate change affects corporations, stakeholders have showed concerns in how companies have struck balance between business development and environmental protection. The Group is committed to carry out its responsibility in a proactive manner, we have been actively promoted green practices and educated our employees the importance of their contribution in building an environmentally friendly workplace together. The Group takes various environmental protection measures in its operations to reduce air emissions and save energy, so as to enhance our sustainable business development.

During the Reporting Period, there was no material non-compliance issue with relevant laws and regulations related to the environment. The relevant laws and regulations including but not limited to Waste Disposal Ordinance of Hong Kong and Environmental Protection Law of the PRC.

### **Air Emissions**

The Group's air emissions mostly came from the exhaust of motor vehicles. Air emissions consists of sulfur oxides ("SOx"), nitrogen oxides ("NOx"), particulate matter ("PM"). One of the motor vehicles is an electric car, and the other motor vehicles are running on unleaded automotive fuel. To reduce air emissions, the Group encourages employees to lessen the usage of these motor vehicles if possible, optimize route planning and perform regular vehicle maintenance.

### **Greenhouse Gas Emissions**

The Group's day-to-day business operations are mainly office-based. Thus, direct and indirect greenhouse gas emissions came from the vehicles owned by the Group and electricity usage for our offices respectively. Although the emissions generated were not material in creating a great impact to the environment, the Group aims to review on our current practices periodically and enhance our green business operations as needed.

## 環境保護

隨著人們對氣候變化如何影響企業之意識不斷提高，持份者關注各公司如何在業務發展與環境保護之間取得平衡。本集團致力主動履行責任，積極推動綠色慣例，並向僱員提倡共同參與建立環保工作環境之重要性。本集團經營時採取各種環保措施，減少氣體排放，節約能源，繼而促進業務之可持續發展。

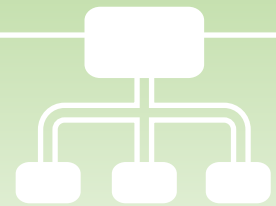
於報告期，概無發生重大環境違法違規情況。相關法律及法規包括但不限於香港廢物處置條例及中國環境保護法。

### **氣體排放**

本集團之氣體排放主要來自汽車排放。氣體排放包括一氧化硫（「一氧化硫」）、一氧化氮（「一氧化氮」）以及懸浮粒子（「懸浮粒子」）。其中，有一輛為電動車，其餘汽車則以無鉛汽油為燃料。為減少氣體排放，本集團鼓勵僱員在可行時盡量減少使用該等汽車，優化路線規劃，以及定期進行汽車保養。

### **溫室氣體排放**

本集團日常業務經營以辦公室為主。因此，我們之直接及間接溫室氣體排放分別來自本集團所擁有之汽車及辦公室耗電量。儘管所產生的排放物對環境影響不大，本集團旨在定期檢討我們目前的慣例，並在需要時加強我們的綠色業務營運。



### Use of Resources

To promote environmental friendliness and consume resources in a more responsible manner, the Group is committed to review and enhance the operation practices to better utilize our resources attained. The Group strives to minimize environmental impact by reducing energy and paper consumption and encouraging to practice the habits of recycling office supplies and other materials.

### Energy

The Group pledges to reduce energy consumption for both money lending and software platform businesses. Several measures were implemented during the Reporting Period:

- Encourage employees to switch off lights and idle equipment before leaving the office or when they are not in use;
- Office printers are set into energy-saving mode by default; sleeping mode will also be activated when necessary;
- Keep the air conditioner of the office at 25°C to maintain an optimal and comfortable temperature;
- Prioritize the use of energy-saving light bulbs instead of traditional light bulbs; and
- Perform regular inspection and maintenance of the office equipment to ensure they are operating efficiently.

### Waste Management

As the Group mainly focuses on money lending and software platform businesses, therefore, no handling of the hazardous wastes or packaging material are involved in our daily operation. Thus, the non-hazardous waste of the Group are mainly paper waste and general waste collected from daily operations in offices. The solid waste generated from the daily operating activities in offices is immaterial due to the avocation of the “3R Rules” including recycling, reuse and reduce.

### 資源使用

為推動環保，以更負責任的態度攝取資源，本集團致力檢討及改善營運方式，以更有效運用所獲得的資源。本集團致力透過減低能源消耗及紙張耗用量，並鼓勵養成回收辦公物資及其他材料的習慣，以達至減輕對環境造成的影響。

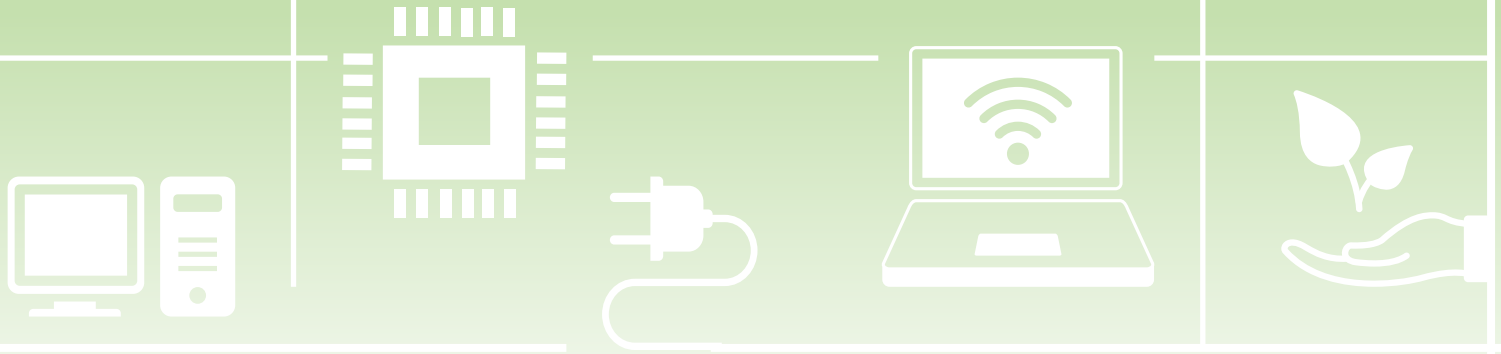
### 能源

本集團承諾在放債業務及軟件平台業務減少能源消耗，並於報告期實施多項措施：

- 鼓勵僱員在離開辦公室前或不使用辦公室設施時關上燈及閒置設備；
- 辦公室影印機預設為節能模式；必要時亦將會啟用睡眠模式；
- 將辦公室之空調室溫設定為25°C，以保持最佳舒適之溫度；
- 優先使用節能燈泡，而非傳統燈泡；及
- 定期進行檢查及保養辦公設備，確保該等設備有效運作。

### 廢物管理

由於本集團專注於放債業務及軟件平台業務，日常營運並不涉及處理任何有害廢物或包裝材料，故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。由於奉行「3R規則」（包括回收、重用及減少），故辦公室日常經營活動所產生之固體廢物並不重大。



During the Reporting Period, our waste management practice complies with laws and regulations related to environmental protection. The following measures have been adopted to reduce paper waste:

- Encourage double-sided printing as well as recycle and reuse of papers are recommended;
- Place boxes and trays next to photocopiers to collect single-sided paper for reuse and recycling;
- Implement a paperless office automation system where emails and documents are read, edit and shared online; and
- Encourage employees to bring their own cutleries to reduce wastes produced from disposable paper utensils.

The Group did not have any significant impact of its business activities on the environmental and natural resources during the Year. With the adaption of the above measures, it is believed that the objectives of saving energy, reducing waste and preserving the environment can be achieved.

### **Water Management**

Our key water usage arises from daily consumption in office, including toilet flushing, tap water and drinking water. All employees are encouraged to increase awareness of conserving water by having reminders posted in washrooms. We would also contact the management office immediately when there is a leakage of water discovered at our offices. During the Reporting Period, we did not encounter any issues in sourcing water.

### **Environment and Natural Resources**

The Group's business operation does not involve the use of natural resources, and hence there was no material impact on the environment in this aspect during the Reporting Period. By taking the above-mentioned green initiatives on saving electricity, water, petrol and paper, the Group will continue its commitment in protecting the environment. We will maintain our practices in penetrating the concept of environmental protection into our daily operations and advocate the concept of building a green office together with the involvement of all employees.

於報告期，我們之廢物管理慣例乃符合環保相關法律及法規。為減少產生廢紙，我們已實施下列措施：

- 鼓勵雙面印刷以及建議回收和重用紙張；
- 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；
- 實施無紙化辦公自動化系統，線上閱覽、編輯和共享電郵及文件；及
- 鼓勵僱員自帶餐具，減少即棄紙製餐具產生之廢物。

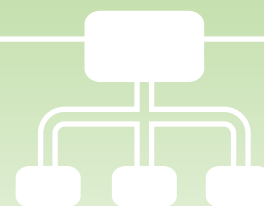
本集團於本年度之業務活動概無對環境及自然資源產生重大影響。藉由實施上述措施，我們相信可達致節能、減廢及環保之目標。

### **用水管理**

我們每天之用水量主要來自辦公室，包括沖廁水、自來水及飲用水。我們於洗手間張貼提示，藉此鼓勵全體僱員提高彼等之節約用水理念。倘發現辦公室有漏水情況，我們亦會立即通知管理處。於報告期，我們在獲得水源方面概無任何問題。

### **環境及自然資源**

本集團之業務經營並不涉及使用自然資源，故於報告期概無在此方面對環境造成重大影響。透過採取上述節約電力、水、汽油及紙張之綠色措施，本集團將繼續致力保護環境。我們將繼續於日常營運秉承環保理念，提倡全員參與、共同打造綠色辦公室之理念。



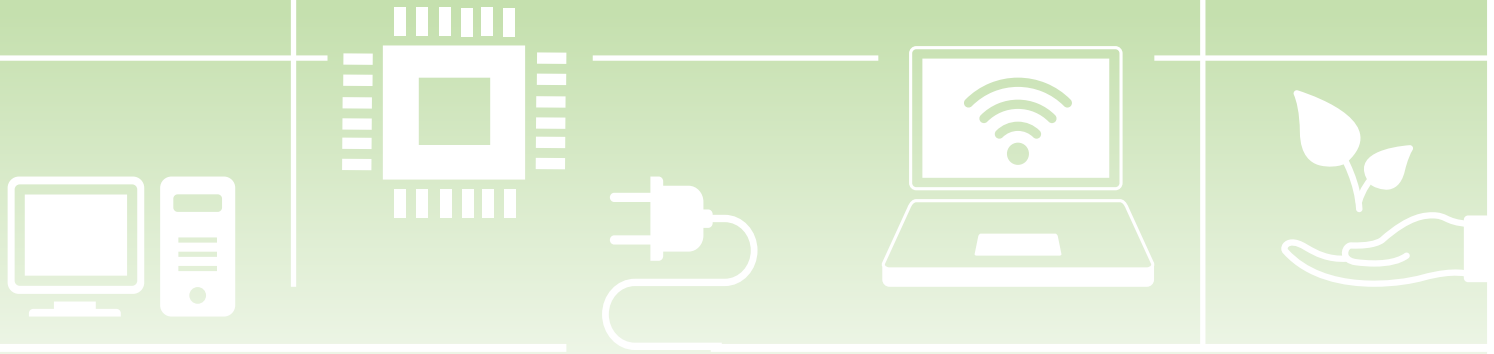
## Summary of Environmental Key Performance Indicators

## 環境關鍵績效指標概要

	2019 二零一九年	2018 二零一八年	Units 單位
<b>Air Emissions</b> 氣體排放			
Nitrogen oxides (NOx) 一氧化氮 (NOx)	3.05	16.91	kg 公斤
Sulfur oxides (SOx) 一氧化硫 (SOx)	0.09	0.16	kg 公斤
Particulate matter (PM) 懸浮粒子 (PM)	0.22	1.24	kg 公斤
<b>Greenhouse Gas Emissions</b> 溫室氣體排放			
Direct GHG emissions (Scope 1) 直接溫室氣體排放 (範圍1)	15.50	29.22	Tonnes of CO <sub>2</sub> e 公噸二氧化碳當量
Indirect GHG emissions (Scope 2) 間接溫室氣體排放 (範圍2)	67.36	75.07	Tonnes of CO <sub>2</sub> e 公噸二氧化碳當量
<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>	<b>82.86</b>	<b>104.29</b>	Tonnes of CO <sub>2</sub> e 公噸二氧化碳當量
Direct GHG emissions (Scope 1) per employee* 每名僱員之直接溫室氣體排放 (範圍1) *	0.27	0.44	Tonnes of CO <sub>2</sub> e/employee* 公噸二氧化碳當量／僱員*
Indirect GHG emissions (Scope 2) per employee* 每名僱員之間接溫室氣體排放 (範圍2) *	1.16	1.14	Tonnes of CO <sub>2</sub> e/employee* 公噸二氧化碳當量／僱員*
<b>Total GHG Emissions (Scope 1 and Scope 2) per employee*</b> <b>每名僱員之總溫室氣體排放 (範圍1及範圍2) *</b>	<b>1.43</b>	<b>1.58</b>	Tonnes of CO <sub>2</sub> e/employee* 公噸二氧化碳當量／僱員*
<b>Non-hazardous Wastes</b> 無害廢物			
Total generated and disposed amount of waste 產生及處置之無害廢物總量	0.18	0.17	Tonnes 公噸
<b>Intensity of non-hazardous wastes</b> <b>無害廢物密度</b>	<b>3.10</b>	<b>2.60</b>	kg/employee 公斤／僱員

\* The number of employees 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僱員人數。



	2019 二零一九年	2018 二零一八年	Units 單位
<b>Energy Consumption</b> 能源消耗			
Total energy consumption 能源消耗總量	<b>140.28</b>	202.64	MWh 兆瓦時
<b>Total energy consumption per employee</b> 每名僱員之能源消耗總量	<b>2.42</b>	3.07	MWh/employee* 兆瓦時／僱員*
Electricity 電力	<b>87.23</b>	102.6	MWh 兆瓦時
<b>Electricity consumption per employee</b> 每名僱員之耗電量	<b>1.50</b>	1.55	MWh/employee* 兆瓦時／僱員*
Unleaded Petrol 無鉛汽油	<b>53.05</b>	100.04	MWh 兆瓦時
<b>Unleaded Petrol consumption per employee</b> 每名僱員之無鉛汽油之消耗量	<b>0.91</b>	1.52	MWh/employee* 兆瓦時／僱員*
<b>Water Consumption<sup>1</sup></b> 耗水量 <sup>1</sup>			
Water 水	<b>83.30</b>	61.30	m <sup>3</sup> 立方米
<b>Water consumption per employee</b> 每名僱員之耗水量	<b>11.90</b>	8.76	m <sup>3</sup> /employee* 立方米／僱員*
<b>Paper Usage</b> 用紙量			
Paper 紙張	<b>313.90<sup>2</sup></b>	804.35	kg 公斤
<b>Paper consumption per employee</b> 每名僱員之紙張消耗量	<b>5.41</b>	12.19	kg/employee* 公斤／僱員*

\* The number of employees 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僱員人數。

<sup>1</sup> As the management fee for the offices of the money lending business included the usage of water consumption is under the control of the property management company, it is not feasible for the Group to obtain the water consumption data of these offices. Same condition applies to the leased properties owned by the Group, 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 was immaterial, the data presented is only for the water consumption for the Guangzhou office from our software platform business only.

由於放債業務辦公室之管理費已包括用水量，其由物業管理公司控制，故本集團無法取得該等辦公室之用水量數據。相同條件亦適用於本集團擁有之租賃物業，即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密度並不重大，呈列之數據僅代表軟件平台業務廣州辦事處之用水量。

<sup>2</sup> The calculation of data was adjusted to reflect the actual consumption.  
已調整資料計算以反映實際消耗情況。

