



2019

ENVIRONMENTAL,
SOCIAL AND
GOVERNANCE
REPORT

PHOENITRON HOLDINGS LIMITED

STOCK CODE: 8066.HK

Contents

<i>ABOUT THE GROUP</i>	<i>3</i>
<i>ABOUT THE REPORT.....</i>	<i>3</i>
<i>MESSAGE FROM THE MANAGEMENT.....</i>	<i>6</i>
<i>SUSTAINABILITY GOVERNANCE.....</i>	<i>7</i>
<i>COMMUNICATION WITH STAKEHOLDERS</i>	<i>8</i>
<i>BUILDING A GREEN ENVIRONMENT</i>	<i>10</i>
<i>DECENT WORKING ENVIRONMENT.....</i>	<i>15</i>
<i>OPERATION RESPONSIBILITY.....</i>	<i>18</i>
<i>MUTUAL DEVELOPMENT WITH COMMUNITY.....</i>	<i>20</i>
<i>COMPLIANCE PERFORMANCE.....</i>	<i>21</i>
<i>OVERVIEW OF KEY PERFORMANCE INDICATORS.....</i>	<i>22</i>
<i>ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORTING GUIDE CONTENT</i>	
<i>INDEX.....</i>	<i>25</i>

ABOUT THE GROUP

Phoenitron Holdings Limited (hereby referred to as “Phoenitron” or the “Company”, together with its subsidiaries, the “Group”) is principally engaged in the contract manufacturing and sales of smart cards and sales and trading of scrap metal. Headquartered in Hong Kong, the Group has investments across Greater China.

Contract manufacturing and sales of smart cards business

The Group has highly automated smart card production facilities, distribution network and sales and marketing teams in Shenzhen and Hong Kong respectively. The Group is principally engaged in the manufacturing of contact smart cards, contactless smart cards and dual contact smart cards combining both. The plants are equipped with milling, embossing, assembly and personalization equipment. The Group also has a product management system and customer after-sales services to provide quality smart card products and delivery services to its customers. Going forward, the Group will enhance production efficiency and develop more high value-added smart card services, such as machine-to-machine (M2M) smart card related services.

Sales and trading of scrap metal

The Group recommenced its scrap metal sales and trading business in Taiwan at the beginning of the third quarter of the year. The Group expects that this business will provide more significant revenue and gross profit to the Group in the future.

Media and Entertainment

During the year, the Group launched its media and entertainment business, which mainly invests in TV dramas. However, no revenue has yet been generated for the year. Looking forward, this business will provide additional revenue and profit to the Group.

Trading of petro-chemical products

As the Group's petrochemical products trading business in Shanghai had no significant revenue and gross profit contribution in the past two years, the Group disposed of this business during the year and the transaction freed up working capital for other future investment plans.

The Group believes that the diversification of its businesses will facilitate the Group's long-term development and generate higher returns for its shareholders. Going forward, the Group will consolidate its contract manufacturing and sales of smart card business and expand the sales and trading of scrap metal business in Taiwan, as well as the media and entertainment business.

ABOUT THE REPORT

This report is the fourth "Environmental, Social and Governance Report" (the “Report”) published by the Group. The Report sets out the Group's policies, measures and performance in the environment, social and governance aspects for the financial year ended 31 December 2019 (the “Reporting Period”). The Report is available in Chinese and English, and it has been posted on the website of the Group at (www.phoenitron.com) and the Stock Exchange of Hong Kong Limited (the “Stock Exchange”) at (www.hkexnews.hk) .

Scope of Report

With the disposal of the sales of the petro-chemical products related business in Shanghai, the scope of the Report has been narrowed to the operation of the Shenzhen plant (the “Shenzhen Plant”) concerning the contract manufacturing and sales of smart card business, which accounted for 86% of the Group's total turnover. Other businesses such as scrap metal sales and trading business and media and entertainment business are not included in the Report. Going forward, the Group will regularly review the scope of the Report and provide more comprehensive disclosure to investors and stakeholders based on the principle of materiality.

Report Standards

The Report is prepared in accordance with the "Environmental, Social and Governance Reporting Guide" (the "Guide") in Appendix 20 to the "Rules Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited", and is based on four reporting principles: Materiality, Quantitative, Balance and Consistency. In order to let stakeholders fully understand the Group's performance in environmental, social and governance aspects, apart from the disclosure of environmental key performance indicators required in "comply or explain", the Group also reports some social key performance indicators specified in the "Recommended Disclosures" under the Guide.

Application Principle	Definition	Application of the Reporting Principle
Materiality	Focusing on environmental, social and governance issues that have a significant impact on the Group and its stakeholders.	The management of the Group identified significant environmental, social and governance issues of the year based on the degree of environmental and social impacts of the manufacturing and sales process, and made key disclosures in the Report.
Quantitative	Key performance indicators should be measurable and, where appropriate, comparable.	The Group records and estimates quantitative data and compares it with past performance where feasible. To ensure the accuracy of environmental key performance indicators, the Group has commissioned an external consultant to conduct carbon assessments, which adopted national and international standards, including the guidelines issued by the National Development and Reform Commission of the PRC, ISO14064-1 and the Greenhouse Gas Protocol. The quantitative data of social key performance indicators in the Report is derived from the statistical records of the relevant departments of the Group.
Balance	The Report should present the Group's environmental, social and governance performance in an objective manner that avoids selection and omission.	The Report is presented in an objective and unbiased manner to ensure that the information disclosed herein gives a true representation of the Group's overall environmental, social and governance performance.
Consistency	Environmental, social and governance (ESG) reports should be prepared in a consistent manner, including disclosure of statistical methods, so that indicators can be compared and corporate performance can be understood.	Wherever feasible, the Group uses consistent statistical methods. In the event of any changes that may affect comparisons with previous reports, the Group has annotated the Report accordingly.

A complete index is appended in the last chapter of the Report for readers' easy reference to the Guide when reading the Report.

CONFIRMATION AND APPROVAL

The Group has set up internal control and formal review procedures, striving to make sure that all the information presented herein is accurate and reliable. The Report was confirmed and approved by the board of directors of the Company in June 2020.

Feedback

The opinions of stakeholders are helpful for the Group to build more sound sustainable development strategy in the future. Should you have any enquiries or comments regarding the content or form of the Report, please contact us:

Address: Suite 710, 7th Floor, North Tower, World Finance Centre, Harbour City, Tsim Sha Tsui,
Kowloon, Hong Kong
Telephone: (852) 2377 1888
Facsimile: (852) 2377 2955
Email: info@phoenitron.com

MESSAGE FROM THE MANAGEMENT

The Group is fully aware of the various potential risks and opportunities brought about by environmental issues including climate change. To this end, the Group actively prepares early responses to deal with various changes in the future by taking into consideration environmental and social effects in the process of making business decisions. We are committed to achieving sustainable development in business, environment and society simultaneously.

In order to effectively address the sustainability issues of the Group, the board of directors of the Group assumes overall responsibility for the supervision of sustainable development and ensures that the sustainable development of the Group are monitored and reviewed through the sustainable development working group led by members of the board of directors. During the year, the Group has revised the "Group Environmental and Social Policies" and added a new statement from the board of directors, so as to strengthen sustainability governance and the accountability of the board of directors.

During the year, the Group identified significant issues for the Group based on the environmental and social impacts of its manufacturing and sales of smart card business, including use of resources, health and safety, development and training, and product responsibilities. We have also focused on significant issues in formulating sustainable development strategies and directions and formulated a series of environmental and social policies and procedures, including the "Social Responsibility Management Manual", the "Management Manual", and the "Environmental System Operation Control Procedure", to provide employees with a healthy and safe working environment, provide customers with quality products and services, and reduce the impact of our operations on the surrounding environment.

Going forward, we will continue to improve its sustainability strategy and related measures to enhance the environmental and social performance of the Group. In the future, we will also consider strengthening communication with different stakeholders to better understand their expectations and views on the Group's operations, respond to potential environmental and social risks as early as possible and create sustainable value for our shareholders and stakeholders.

Lily Wu
Chairman
Phoenitron Holdings Limited

SUSTAINABILITY GOVERNANCE

Good corporate governance is an essential aspect of healthy corporate development and maintaining investors' trust. The board of directors has a leading role in the governance structure and is responsible for overseeing the sustainable development of the Group.

During the year, the Group has revised the "Group Environmental and Social Policies" and added a new statement from the board of directors, strengthened sustainability governance and the accountability of the board of directors, and implemented the Group's policy direction and guidelines for employees in relation to sustainability matters.

Statement from the Board of Directors of Phoenitron

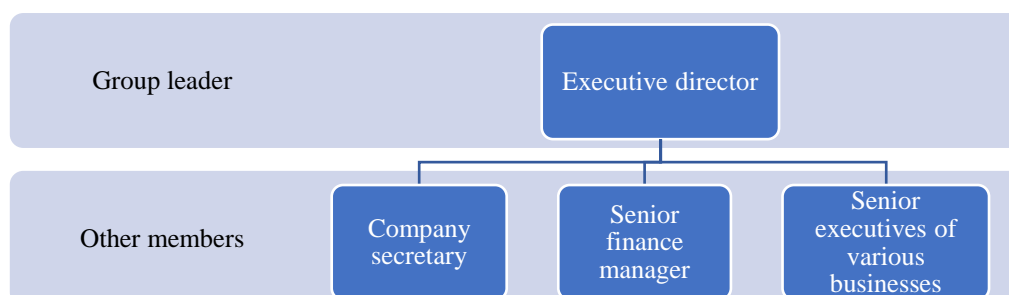
The board of directors of the Group is ultimately responsible for environmental, social, and governance related matters. These include:

- To oversee environmental, social and governance policies, and the formulation and implementation of related objectives;
- To assess and identify environmental, social and governance related risks and opportunities;
- To ensure the effectiveness of environmental, social and governance risk management and internal control systems;
- To review the efficacy of environmental, social and governance works; and
- To review and approve the annual environmental, social and governance report.

The board of directors supervises environmental, social and governance matters by directly appointing board members to lead the sustainable development working group and receiving regular reports on the work of the sustainable development working group. The board of directors identifies, assesses and manages significant environmental, social and governance-related issues through the works of the sustainable development working group such as collecting and analysing of data as well as communicating with experts and reviews the progress in relevant objectives based on the work report of the sustainable development working group.

The Group has established an environmental, social and governance working group to be responsible for matters related to sustainable development. The board of directors affirmed its working powers and functions, and has also authorised the head of the working group to lead all relevant matters and report regularly to the board of directors. The Group's company secretary and senior finance manager serve as deputy team leader and coordinator of the working group respectively, they are responsible for managing sustainable development issues and compliance performance, as well as liaison and communication of the working group respectively.

Structure of the Sustainable Development Working Group



Risk Management

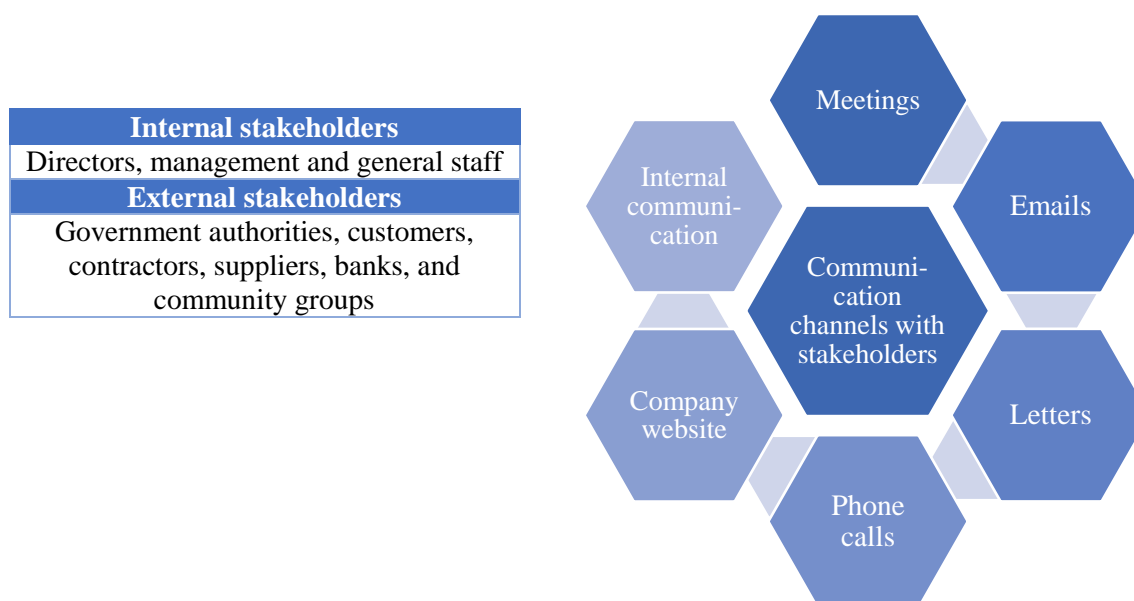
The board of directors has ultimate responsibility for maintaining the effectiveness of the internal control system and risk management. The board of directors conducts a review of the risk management and internal control system at least once a year, covering financial, operational, compliance procedures and risk management.

Under the supervision of the board of directors and the sustainable development working group, each operating point of the Group identifies potential sustainable development risks through data analysis and regular inspection, and takes corresponding measures in accordance with the order of priority, evaluates the situation and reports in due course.

The Group is aware that the current risk management and internal control system does not fully cover sustainability issues. Looking ahead, the Group will continue to improve its sustainability risk management efforts and deepen the functions of its sustainable development working group so that the Group can deal with sustainable development matters more effectively.

COMMUNICATION WITH STAKEHOLDERS

Good communication with stakeholders¹ allows the Group to understand their expectations and views on the Group and helps the Group determine future sustainable development policies and future business directions.



Significant Sustainable Development Issues

During the year, the management of the Group identified the significant sustainable development issues based on degree of impact by contract manufacturing and sales of smart card business on the environment and society. These identified issues are highlighted for disclosure in the Report and will assist the Group in formulating future sustainability strategies and directions. The following issues were identified during the year:

¹ "Stakeholders" or "interested parties" represent groups and individuals who have significant impacts on the enterprise's businesses, or those who are affected by the enterprise's business, including internal directors, management, executives and general staff, and external shareholders, business partners, customers, government and regulatory authorities, banks, investors and community groups.

Scope	Significant sustainable development issue	Impact on the environment and society	Measures implemented by the Group
Environmental Protection	Use of resources	The Group needs to consume different limited resources in the production process, including electricity, water, paper and various raw materials. To effectively use resources and reduce the impact on the environment, the Group needs to implement different resource saving measures.	The Group formulated the "2019 Environmental Goals, Objectives and Management Plan".
Employee Care	Health and Safety	The production process of the Group involves the use of different production machines and chemicals, which poses risks to the health and safety of employees. In the event of an accident, the use of medical resources would also increase.	The Group formulated the "Occupational Health Management System" to provide employees with protective equipment, occupational physical examination and occupational health training.
	Development and Training	The Group needs to provide long-term development direction to its employees in order to attract and retain talents. Employee training also increases operational efficiency and enhances staff competitiveness.	The Group provides employees with a wide range of training opportunities, including safety training and skills training.
Operational Responsibility	Product Responsibility	Product quality is the key factor to maintain customer satisfaction. The Group attaches great importance to improving the durability of products, prolonging the service life of products and avoiding excessive waste production.	The Group conducts testing and analysis of the entire production process in accordance with the "Management Manual", and has established the ISO 9001:2015 quality management system to control the quality of each product.

Going forward, the Group will continue to strengthen communication with its stakeholders through different communication methods, such as focus group interviews, telephone and email communication and board questionnaires, to further understand the expectations and opinions of internal and external stakeholders on the sustainability issues of the Group and formulate future sustainable development strategies.

BUILDING A GREEN ENVIRONMENT

The Group is committed to integrating the concept of environmental protection into its operating policies and formulating measures to reduce the impact of the operation process on the surrounding environment. The Group has formulated the "Group Environmental and Social Policies", which provides guidance on relevant areas, including emission management, resource conservation and reduction of environmental impacts of operations. The Group has also formulated the "2019 Annual Environmental Objectives, Indicators and Management Plan" at the Shenzhen Plant, setting targets for hazardous waste and resource conservation.

"2019 Annual Environmental Objectives, Indicators and Management Plan"

Environmental Category	Environmental Management Category	Progress on Current Year Objectives
Power consumption	Monthly electricity consumption is maintained at not more than 17kWh for every 1,000 smart cards produced.	Up to standard
Water consumption	Monthly water consumption is not more than 2 cubic metres per person.	Not up to standard yet (The Group will review the water consumption target and the water saving measures that can be implemented)
Paper consumption	Monthly paper consumption is not more than 15 reams of paper.	Up to standard
Discharge of hazardous wastes	According to the classification of solid and liquid hazardous wastes, all hazardous wastes are collected and treated by environmental protection companies.	Up to standard
Noise emission	Ensure that the noise emission complies with the national standard GB12348-2008, maintain not more than 60 decibels during the day and not more than 50 decibels at night.	Up to standard

Resource Conversation

The Group uses resources such as electricity, water, paper and raw materials in its operations. In order to effectively and prudently use resources in the operation process, the Group has established a number of resource management measures in Shenzhen Plant in accordance with the "Environmental System Operation Control Procedure", covering the production process, material procurement and administration. In addition, Shenzhen Plant also implemented the following energy-saving measures through the "2019 Annual Environmental Objectives, Indicators and Management Plan":

Water consumption	Power consumption
<ul style="list-style-type: none"> Monthly water consumption statistics and data analysis, and water conservation measures as needed. Regular inspection and maintenance of water facilities, and modification of appliances that consume large amounts of water; and Enhancing employee awareness of water conservation, e.g. posting of water saving signs. 	<ul style="list-style-type: none"> Employees should turn off all office equipment when they leave the office and set to power-saving mode when idle. Conducting regular appliance inspections to repair or modify into more energy-consuming appliances as soon as possible. Implementation of sub-divisional lighting and removal of some lamps to reduce excessive lighting; and Raising employee awareness on electricity conservation, and posting energy-saving signs as reminder.

Paper consumption	Raw materials
<ul style="list-style-type: none"> • Encouraging staff to use double-sided printing except in special circumstances; • Refusal of excessive copying; • Inspecting paper equipment regularly to ensure that problems are dealt with as soon as possible; • Promoting the importance of paper conservation among employees and enhancing their awareness of the need to conserve paper; and • Promoting the use of electronic communication for daily work communication. 	<ul style="list-style-type: none"> • Standardising the production process in accordance with the requirements of the quality management system; • Monthly statistics on the amount and rate of raw material consumption, and implementing conservation measures to reduce excessive consumption of raw materials; and • Dismantling obsolete mechanical parts and recycling undamaged parts.

During the year, the Group consumed a total of 2,251.5 MWh equivalent of energy equivalent, of which 2,207.8 MWh was electricity consumption, accounting for 98% of the total energy consumption. This was followed by gasoline with 43.7 MWh equivalent, accounting for 2% of the total energy consumption. This year, compared to last year, energy consumption increased by 7% due to increased production capacity, electricity consumption increased by 8%, while gasoline consumption decreased by 23%.

Energy Use	2019	2018	Unit
Gasoline	43.7	56.7 ²	MWh equivalent
Electricity	2,207.8	2,039.3 ²	MWh
Total Energy Consumption	2,251.5	2,096.0 ²	MWh equivalent
Energy intensity	38.7	41.8 ²	MWh equivalent / HK\$ million (by output value)

For a detailed breakdown of energy consumption by type, please see OVERVIEW OF KEY PERFORMANCE INDICATORS in the Report.

Use of main raw materials and packaging materials

During the year, the Group used a total of 130 tonnes of main raw materials and packaging materials, which included packaging paper, plastic and wood. The use of main raw materials and packaging materials decreased by 24% in the current year as compared to the previous year, mainly due to the Group's implementation of recycling and reuse of packaging paper and the reduction of complex packaging.

Emission Management

The Group is concerned about the emissions from its business operations, such as greenhouse gases, air pollutants, wastes and sewage, and strives to reduce the impact of these emissions on the surrounding environment.

Air emissions

The Group's air emissions mainly come from nitrogen oxides, sulphur oxides and respirable suspended particulates emitted from fuels used by vehicles. Regarding the emission of air pollutants, the Group has stipulated transportation arrangements and business trips in accordance with the "Group Environmental and Social Policies", including integrating transportation arrangements, selecting more

² Figures have been adjusted to reflect actual usage.

environment-friendly transportation service providers, and encouraging the use of electronic communication for meetings to reduce business trips.

Compared with the previous year, the emissions of nitrogen oxides, sulphur oxides and respirable suspended particles have decreased by 35%, 20% and 36% for the year respectively.

Types of Emissions ³	2019	2018 ⁴	Unit
Nitrogen oxide	1.74	2.67	kg
Sulphur oxide	0.37	0.46	
Respirable suspended particulates	0.16	0.25	

Greenhouse gas emissions

The Group manages and controls greenhouse gas emissions in the course of operations through measures including energy conservation and management of transportation arrangements in accordance with the "Group Environmental and Social Policies".

During the year, the Group continued to commission Carbon Care Asia, a consultancy firm, to conduct a carbon assessment to calculate the greenhouse gas emissions from its operations. The calculation is based on the guidelines⁵ issued by the National Development and Reform Commission of the People's Republic of China, as well as international standards such as ISO 14064-1 and the Greenhouse Gas Protocol to ensure that environmental key performance indicator information is accurately disclosed.

Total carbon emission
1,530.2 tonnes of carbon dioxide equivalent

Total carbon emission intensity
(by output value)
26.3 tonnes carbon dioxide equivalent per HK\$ million

The Group's total greenhouse gas emissions in this year amounted to 1,530.2 tonnes of carbon dioxide equivalent, mainly from the outsourcing of power use in scope 2, accounting for 88% of the total emissions, followed by fugitive emissions related to the combustion of mobile source fossil fuels and refrigerants in scope 1, accounting for 12% of the total emissions. Compared with 2018, greenhouse gas emissions increased by 7%, mainly due to an 8% increase in electricity consumption due to increased production capacity. However, as a result of the Group's integrated transportation arrangement, emissions related to vehicle use have been reduced by 23%.

³ Only air pollutant emissions related to fossil fuel combustion from mobile sources are included.

⁴ As the scope of the Report for the year only include data from the Shenzhen Plant due to business adjustment, the key environmental indicators for 2018 have been adjusted to include only the data from the Shenzhen Plant.

⁵ "Greenhouse Gas Emission Accounting Methods and Reporting Guidelines for Electronic Equipment Manufacturing Enterprises (Trial)"

Scopes	2019	2018	Unit
Scope 1 : Direct greenhouse gas emissions ⁶	183.2	185.8 ⁷	tonnes carbon dioxide equivalent
Scope 2 : Energy indirect greenhouse gas emissions ⁸	1,347.0	1,244.2 ⁷	
Total greenhouse gas emissions	1,530.2	1,430.0 ⁷	
Intensity of greenhouse gas			
By output value	26.3	28.5 ⁷	tonnes carbon dioxide equivalent / HK\$ million

Looking ahead, the Group will continue to improve on the main sources of carbon emissions. The Group will assess, record and make annual disclosure of its greenhouse gas emission and other environmental data, and uses the figures in the Reporting Period as baseline figures to compare the figures for subsequent years. As such, the Group can assess the effectiveness of its existing measures and further formulate emission reduction targets in the future.

Waste

The Group generates hazardous and non-hazardous waste in its daily operation. In order to ensure that waste is properly treated and recycled, the Group launches relevant waste management measures in accordance with the "Group Environmental and Social Policies" and the "Environmental System Operation Control Procedures" of Shenzhen Plant, including waste reduction at the source, collecting and sorting of different kinds of waste, recycling and disposal.

For hazardous waste, the Group has established the "2019 Environmental Goals, Objectives and Management Plan" to ensure that employees properly dispose of wastes in accordance with relevant guidelines.

Measures to manage hazardous waste
<ul style="list-style-type: none"> • Store scrapped lamps, oily waste rags, refills, ink cartridges and ink bottles, as well as all types of identified hazardous waste at designated location, and record them on the hazardous materials recovery form • Install fire-fighting equipment in hazardous waste storage locations • Regularly arrange hazardous waste recycling companies to carry out waste diversion and maintain relevant records; and • Provide training on the classification and storage of hazardous wastes for all employees and enhance their knowledge of hazardous wastes.

During the year, the Group generated a total of 31.5 tonnes of non-hazardous waste including packaging paper, plastics and other daily waste. Packaging paper and plastics are sold to recyclers, while general daily waste is disposed of centrally. Compared with the previous year, the total output and density of non-hazardous wastes generated by the Group have decreased by 10% compared with last year.

During the year, the Group generated a total of 0.5 tonne of hazardous waste, mainly including waste oil from the plant. All hazardous waste has been collected by qualified recycling company. The output and density of hazardous waste this year are the same as last year.

⁶ Scope 1 includes fugitive emissions associated with mobile source fossil fuel combustion and refrigerants. Due to the one-time addition of several years' refrigerant for use to the plant in the year, the associated fugitive emissions should be distributed equally between the years. As such, the 2018 refrigerant-related fugitive emissions have been re-estimated to achieve a consistent presentation.

⁷ The figures have been adjusted to reflect actual emissions.

⁸ Scope 2 includes emissions from electricity purchased from electric companies. Since the calculation of greenhouse gas emissions from electricity in the year has been replaced by the average emission factor of the national grid, the indirect greenhouse gas emissions from energy in 2018 have been re-estimated to achieve a consistent presentation.

Waste	2019	2018	Unit
Output of non-hazardous waste	31.5	35.0	tonnes
Density	5.25	5.83	tonnes/thousand m ²
Output of hazardous waste	0.5	0.5	tonnes
Density	0.08	0.08	tonnes/thousand m ²

Wastewater discharge

The Group is committed to ensuring the safe discharge of wastewater. The Group has established a sewage discharge system in accordance with the DB44/26-2001 secondary standard of "Guangdong Province Local Standard Water Pollutant Discharge Limits" as well as the "Group Environmental and Social Policy". The domestic wastewater from the Group is discharged into the septic tank via the pipeline, and then discharged into the municipal sewage pipeline after being processed by the septic tank. Currently, the Group's operation does not involve industrial wastewater discharge.

The Group will continue to assess, record and make annual disclosure of its greenhouse gas emissions and other environmental data, and use the figures in the Reporting Period as the baseline figures to compare the figures for subsequent years, thereby assessing the effectiveness of existing measures and helping to further develop emission reduction targets in the future.

The Environment and Natural Resources

The Group pays attention to the impact of its daily operations on the surrounding environment and natural resources. In response to fire hazards and environmental incidents arising from possible leakage of waste during operation, the Group has formulated the "Management Procedures for Emergency Response Plans" as emergency response plans to avoid environmental pollution caused by fire hazards. The Group needs to evaluate the potential impact of the surrounding environment when building or expanding a plant, identify various internal environmental factors and update the "Chemical Preparation List" based on the results, and formulate countermeasures to reduce the impact on the environment.

In addition, to reduce noise pollution from the production process, the Group has developed the "Environmental Objectives and Management Scheme" and the "Environmental System Operation Control Procedures" to implement noise control. The Group regularly entrusts an external company to conduct noise testing for the plant in accordance with the "National Standard GB2348-2008 Noise Standard of the People's Republic of China", and implements relevant corrective measures based on the testing results. The Group also conducts daily inspections and maintenance of plant machinery and equipment to ensure that the noise produced by the machinery meets the standards of various regulations.

DECENT WORKING ENVIRONMENT

The success of the Group depends on the joint efforts and contributions of employees. The Group is committed to providing employees with a perfect employment system and a healthy and safe working environment. The Group has formulated various personnel policies such as the "Group Environmental and Social Policies", the "Occupational Health Management System" and the "Social Accountability Management Handbook".

Health and Safety

To safeguard the health and safety of employees, the Group has established dedicated responsible units at each operating point in accordance with the "Group Environmental and Social Policies" to take charge of occupational health. The Shenzhen Plant of the Group has also formulated relevant occupational health and safety measures in accordance with the "Occupational Health Management System" and the "Social Accountability Management Handbook" to ensure the protection of employees in different positions.

Safety issues	Occupational safety measures
Production equipment operation	<ul style="list-style-type: none"> • Daily maintenance of all equipment; and • Provide employees with safe operation guidelines.
Use of chemicals	<ul style="list-style-type: none"> • Establish guidelines on the use and transportation, identification and storage, leakage and disposal and handling of chemical substances; and • Regularly review the chemical use procedures and its protective measures.
Occupational hazards	<ul style="list-style-type: none"> • Distribute protective equipment according to job risks; • Provide occupational health training to employees; • Conduct occupational health physical examinations for employees once every year; and • Remove sick employees from their positions for receiving treatment.
Fire and emergency disasters	<ul style="list-style-type: none"> • Inspect and maintain equipment on a regular basis; • Establish a fire emergency plan; • Conduct fire drills and emergency drills; and • Conduct investigations into safety incidents to find out the causes and formulate corrective and preventive measures.

During the year, the Group did not have any safety accidents resulting in work-related deaths. However, the Group recorded one work-related accident, which was mainly due to an accident occurring when an employee placed boards during operation. The injured employee was fine after undergoing an examination at the hospital and stayed at home for two days for observation. In response to this accident, the Group will strengthen production safety and protection training for employees to increase employees' safety awareness.

Development and Training

The Group values the long-term personal development of employees and provides employees with training and development opportunities to enhance their knowledge and work skills. The Group stipulates relevant training and development policies in the "Group Environmental and Social Policies". The Shenzhen Plant has also established the training plan and relevant employee training activities for the year in accordance with the "Training Control Procedure" and the "Orientation Training Procedure for New Employees". The Group encourages employees to participate in external training opportunities to improve their work-related knowledge and skills. The Group has created training files for each employee receiving training to record the training content and relevant assessment result of the relevant employee.

According to the "Training Control Procedure", the Group provides the following training:

Training type	Training content
Orientation training	Hired employees are required to receive orientation training on corporate profile, teamwork and disciplines, product quality and safety awareness.
Technical training	According to the production process and employee position requirements, employees are provided with professional knowledge in their positions, process flow, machine operation training, and new product and technical training.

During the year, all employees of the Group received training, involving a total of 126 employees. During the year, the total number of hours of training received by employees reached 1,392 hours. On average, each employee received 11 hours of training.

Employment System

The Group understands that a sound employment system can attract and retain talents. The Group has formulated the "Group Environmental and Social Policies", the Shenzhen Plant dedicated "Social Accountability Management Handbook" and the "Human Resources Management Procedure" as well as a series of employment systems that set out the arrangements made for employees in recruitment, dismissal, remuneration, promotion, rest periods, equal opportunities, anti-discrimination, other benefits and welfare to let employees know the employment regulations and arrangements of the Group.

Recruitment and dismissal	The Group conducts recruitment in accordance with the "Employee Recruitment Management Procedures", and adopts the principles of openness, fairness, justice and merit-based recruitment to select suitable candidates. The Group or an employee may propose to terminate the labour contract as required, and notify the Group in advance according to the notice period, and complete the leave and handover procedures in accordance with the requirements.
Remuneration and promotion	The Group pays wages and subsidies based on the job functions of employees in accordance with the "Employee Wages and Welfare Management Measures". The Group also grants year-end bonuses, and awards bonuses or equivalent prizes to employees with outstanding performance. According to the "Employee Promotion System", the Group promotes suitable employees based on their experience and performance, as well as department employee promotion evaluations.
Working hours and rest periods	The Group arranges the working hours and rest periods of employees in accordance with the "Attendance Management System" and the "Employee Leave Application and Leave Management Regulations".
Equal opportunity	The Group will not subject employees and job applicants to unfair treatment because of age, gender, race, religion, marital status, sexual orientation or disability.
Anti-discrimination	The Group strictly prohibits any form of discrimination and sexual harassment in the workplace.
Other benefits and welfare	According to the "Employee Wages and Welfare Management Measures", the Group provides employees with housing and communication allowance, work-related injury insurance, pension insurance, medical insurance, meal allowance, and pension. The Group also regularly provides sports and recreational activities for employees to enhance their sense of belonging to the Group.

The Group encourages employees to make suggestions and complaints to the management on the Company's operation in accordance with the "Employee Complaint and Suggestion Management System". All complaints are handled in an objective and confidential manner, and are dealt with in a serious manner, in order to improve the relevant system.

As the Group's diversification policy is still being formulated, looking ahead, the Group will continue to review the current employment system and review how to improve the Group's diversification systems and regulations.

During the year, the Group employed a total of 126 employees, and the ratio of male to female employees was 2.2:1. The new hire and employee turnover rates for the year were 44.4% and 39.7%, respectively.

Labour Standards

The Group strictly prohibits the employment of child labour and prohibits forced labour. The Group formulates relevant measures in accordance with the "Social Accountability Management Handbook" and the "Human Resources Management Procedure" to ensure that employees' legitimate labour rights and interests are protected.

The Group prohibits the employment of any child labour under the age of 15. When recruiting new employees, the personnel and administration departments of the Group will check the identity documents of the candidates in accordance with the "Human Resources Management Procedure" to ensure that they meet the minimum working age requirements of local laws and regulations. If it is found that child labour is hired by mistake, the Group shall immediately implement the "Child Labour Rescue Management Procedure" and stop the work of child labour. The Group will also be responsible for all expenses required by the child labour before reaching the working age.

In addition, the Group strictly prohibits any form of forced labour in accordance with the provisions of the "Social Accountability Management Handbook", and all employees are required to work on a voluntary basis. Employees can also apply for resignation in accordance with the regulations of the Group and obtain wages to which they are entitled to leave freely.

OPERATION RESPONSIBILITY

The Group is committed to improving product quality and supply chain management, providing customers with quality products and services, and maintaining a corporate culture of integrity. The Group has established the "Group Environmental and Social Policies" and a series of policies on product responsibility, supply chain management and anti-corruption to ensure that product quality meets the regulations and reduce operational risks.

Product Responsibility

The Group is committed to providing quality products and services to safeguard the interests of customers. The Group has formulated relevant systems at the Shenzhen Plant to ensure that product quality, complaint handling procedures and customer privacy protection meet customer expectations and relevant laws and regulations.

Product responsibility	Management measures
Product quality	The Group monitors and analyses the entire production process in accordance with the "Management Manual", and implements improvement measures based on the monitoring results to ensure that the production process is improved and product quality is enhanced. The Group has also established an ISO9001:2015 quality management system to control the quality of various products. There was no case of product recall during the year.
Label management	The Group appropriately labels raw materials, semi-finished products and finished products in accordance with the "Control Procedures on Product Identification and Traceability" in order to trace and reduce the confusion of products. Labels are only used for those raw materials, semi-finished and finished products that pass the quality inspection, and information such as product name, product number, quantity and inspector's name is set out on the label to ensure that the product is traceable so as to facilitate future quality monitoring and management.
Customers' privacy	The Group has established a security mechanism in accordance with the "Confidentiality Management System of Customers' Information" to safeguard customer privacy and data. All customer information and materials must be kept confidential, classified and archived according to the degree of confidentiality, and access permissions shall be set. If it is found that a customer's information is leaked accidentally, remedial measures shall be taken immediately and the customer shall be notified and corresponding compensation shall be made.
Intellectual property	The Group values and strictly manages intangible assets such as intellectual property rights of customers. The Group's "Management Manual" stipulates that disclosure of customers' intellectual property rights shall not be made to third parties without the permission of customers. The Group also needs to ensure that the intellectual property rights of the Group are not leaked during business cooperation.
Complaint handling	The "Management Manual" specifies the customer complaint mechanism. If a customer complains about a product failure, the Group needs to immediately analyse the cause and take corrective measures to meet the customer's requirements. During the year, the Group received a total of 22 customer complaints about product quality, mainly related to smart card and chip appearance problems and smart card indentation. The Group analysed all complaint cases and found out the reasons and made corrective measures. All complaints have been handled properly.

Supply Chain Management

The Group understands that effective supply chain management is an important element in providing quality products. The Group has established the "Group Environmental and Social Policies", the Shenzhen Plant dedicated "Social Accountability Management Handbook" and the "Purchasing Control Procedures" to regulate the procedures for procurement and supplier selection. Moreover, in the process of selecting suppliers, in addition to inspecting product quality, the Group will also consider the environmental and social performance of suppliers.

Environment

•In order to ensure that suppliers comply with the environmental protection laws and regulations required by the government, the Group has signed the "Environmental Protection Commitment Agreement" with suppliers. Meanwhile, the Group also arranges employees to receive training on green procurement to increase their awareness.

Society

•The Group requires suppliers to comply with the requirements set by the Group's SA 8000 social accountability standards and the "Social Accountability Management Handbook", and requires suppliers to regulate human rights, employee safety and forced labour. SA 8000 is the world's first international standard of ethics. Its purpose is to ensure that all products supplied by suppliers meet the requirements of social accountability standards.

The Group regularly evaluates suppliers through questionnaires and field visits to ensure that suppliers meet the Group's requirements for product quality, environment and society. Qualified suppliers will be included in the "List of Recognised Suppliers" for the Group's choice. During the year, the Group had 7 suppliers providing product raw materials and equipment, and all suppliers were from Mainland China.

Anti-corruption

The Group has always upheld the highest standards of business ethics and corporate integrity, and will never tolerate any acts of corruption and maintain a culture of corporate integrity. The Group has formulated the "Group Environmental and Social Policies", the Shenzhen Plant dedicated "Anti-corruption and Anti-bribery Control Procedure" and the "Gift and Gifting Procedure" as well as other relevant anti-corruption policies and codes, which stipulate that any bribery, blackmail, fraud and money laundering is strictly prohibited during the operation process.

According to the "Anti-corruption and Anti-bribery Control Procedure" and the "Gift and Gifting Procedure", employees of the Shenzhen Plant should not accept or request gifts and gifting from suppliers for any reason. If gifts or gifting cannot be refused due to special reasons, it should be directly notified to the upper management. Employees should also avoid conflicts of interest. If this happens, employees should report to their superiors or the administration department in a timely manner and deal with it based on the feedback from their superiors. In order to ensure that the culture of integrity is extended to the supply chain, the Group has added anti-corruption clauses to its business contracts and signed the "Letter of Undertaking of Non-bribery/Non-corruption for Suppliers" to ensure the highest standards of business ethics.

For potential and existing corruption cases, the Group will conduct an investigation in accordance with the "Anti-corruption and Anti-bribery Control Procedure" and report to the audit committee and the management based on the results. During the year, the Group did not receive corruption litigation cases against the enterprise or its employees.

The Group also provides employees with anti-corruption training, enhances employees' awareness of anti-corruption and bribery, and maintains a culture of corporate integrity. During the year, the Group provided anti-corruption training for 62 employees.

MUTUAL DEVELOPMENT WITH COMMUNITY

Upholding the tenet of “from the community, for the community”, the Group is committed to practicing corporate social responsibility and encourages employees to give back to the society. The Group has established the "Group Environmental and Social Policies" and the "Giving Back to the Society and Social Investment Management System" to set the direction of community investment.

During the year, the Group allocated HK\$22,000 and 104 hours for different activities in the community, which mainly focused on labour employment and the natural environment, bringing a positive impact to the community.

Charity-based recruitment event

The Group actively participates in public welfare talent recruitment events organised by human resources market organisations, and provides different job positions for applicants to apply. A total of 5 volunteers participated in this event and HK\$2,000 were invested.

Tree-planting activity

The Group participates in tree-planting activities organised by community sub-district offices every year, with the goal of improving the natural environment around the plant area. A total of 32 volunteers participated in this event and HK\$20,000 were invested.

Looking ahead, the Group will continue to strengthen the community investment policy, add different community projects and give back to the society.

COMPLIANCE PERFORMANCE

Level	Laws and regulations that have significant impacts on the Group	Significant impacts on the Group and ways to ensure the compliance with these laws and regulations
Emissions	"The Environmental Protection Law of the People's Republic of China"	The Group has implemented the ISO 14001 environmental system and regularly conducts external audits every year. It has entered into an agreement for directional recycling with a professional treatment company on the generation of the environmentally hazardous waste. This portion of expenditure is approximately HK\$34,000 each year. The Group conducts daily business operations in strict accordance with the Environmental Protection Law to ensure compliance with ISO 14001 standards.
Employment	"The Labour Law of the People's Republic of China"	The restrictions of national regulations on working hours have a certain impact on the hiring of employees by the Group. The Group needs recruited more workers, and the overall wage expenditure has increased by approximately 5-10%. The Group strictly implements the labour laws stipulated by the state to protect the rights and interests of workers.
Health and safety	"The Production Safety Law of the People's Republic of China" "The Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases" "The Fire Control Law of the People's Republic of China"	Production safety is an important element of the Group's continued operations. The Group pays attention to the physical health and safety of employees and strives to reduce the harm to employees' health caused by operations. In addition to a series of occupational safety measures, the Group also regularly provides employees with relevant training on production safety, fire protection, and occupational health.
Labour standards	"The Labour Law of the People's Republic of China" "The Law of the People's Republic of China on the Protection of Minors"	Child labour and forced labour violate basic human rights and international labour conventions and pose a threat to sustainable social and economic development. Those violating laws and regulations may also be subject to penalties by regulatory authorities. The Group strictly complies with all applicable laws and conventions, and establishes policies and enforcement measures for child labour and forced labour, etc.
Product responsibility	"The Product Quality Law of the People's Republic of China"	The business development of the Group relies on a high level of product quality. Therefore, the Group strives to maintain its product quality objectives. The Group regularly conducts training on product quality requirements, with quality coming first. The Group monitors and analyses the entire production process in accordance with the "Management Manual", and implements improvement measures based on the monitoring results to ensure that the production process is improved and product quality is enhanced. The Group has also established an ISO 9001:2015 quality management system to control the quality of various products.

During the year, the Group did not violate the above relevant laws and regulations that had a significant impact on the Group. At the anti-corruption level, there are no relevant laws and regulations that have a significant impact on the Group.

OVERVIEW OF KEY PERFORMANCE INDICATORS

Environmental Performance

Environmental Key Performance Indicators		Data		Unit
		2019	2018 ⁹	
Atmospheric pollutants ¹⁰	Nitrogen oxides	1.74	2.67	kg
	Sulphur oxides	0.37	0.46	kg
	Respirable suspended particulates	0.16	0.25	kg
Greenhouse gas	Scope 1 ¹¹	183.2	185.8 ¹²	tonnes carbon dioxide equivalent
	Scope 2 ¹³	1,347.0	1,244.2 ¹²	tonnes carbon dioxide equivalent
	Total greenhouse gas emissions	1,530.2	1,430.0 ¹²	tonnes carbon dioxide equivalent
	Intensity of greenhouse gas emissions (by output value)	26.3	28.5 ¹²	tonnes carbon dioxide equivalent/HK\$ million
Hazardous waste	Total hazardous waste	0.5	0.5	tonne
	Intensity of hazardous waste (by per thousand square metre)	0.08	0.08	tonne/thousand m ²
Non-hazardous waste	Total non-hazardous waste	31.5	35.0 ¹⁴	tonne
	Intensity of non-hazardous waste (by per thousand square metre)	5.25	5.83 ¹⁴	tonne/thousand m ²
Energy	Gasoline	43.7	56.7 ¹⁴	MWh equivalent
	Electricity	2,207.8	2,039.3 ¹⁴	MWh
	Total energy consumption	2,251.5	2,096.0 ¹⁴	MWh equivalent
	Intensity of energy (by output value)	38.7	41.8 ¹⁴	MWh equivalent/HK\$ million
Water consumption	Total water consumption	3,310	3,180 ¹⁴	m ³
	Intensity of water consumption (by number of employees)	26.3	26.5 ¹⁴	m ³ /employee
Main raw materials and packaging materials	Total main raw materials and packaging materials	130.00	170.00	tonne
	Intensity of main raw materials and packaging materials (by output value)	2.23	3.39	tonnes carbon dioxide equivalent/HK\$ million

⁹ As the scope of the Report for the year only includes data from the Shenzhen Plant due to business adjustment, the key environmental indicators for 2018 have been adjusted to include only the data from the Shenzhen Plant.

¹⁰ Including only atmospheric pollutant emissions related to mobile source fossil fuel combustion.

¹¹ Including fugitive emissions related to mobile source fossil fuel combustion and refrigerants. Since refrigerants for several years were added one-off to the plant during this year, the related fugitive emissions should be evenly distributed among the years, as a result, refrigerant-related fugitive emissions for 2018 have been re-estimated for consistency comparison.

¹² The figures have been adjusted to reflect actual emissions.

¹³ Including use of electricity with purchased energy sources. The calculation of electric greenhouse gas emissions for the year has been changed to go with the national grid average emission factor, as a result, 2018 energy indirect greenhouse Gas emissions have been re-estimated for consistency comparison.

¹⁴ Figures have been adjusted to reflect actual usage.

Social Performance – Employment and Labour Practice

Employee distribution		2019	2018	
Number of employees	Gender	Male	87	74
		Female	39	46
	Age	Below 30	58	77
		30-40	50	37
		41-50	17	4
		Above 50	1	2
	Position	Main leaders	2	2
		Senior management	11	10
		Middle management	10	9
		Ordinary employees	103	99
Total number of employees		126	120	
Number and percentage of new employees	Gender	Male	41 (47%)	29 (39%)
		Female	15 (38%)	17 (37%)
	Age	Below 30	35 (60%)	38 (49%)
		30-40	19 (38%)	8 (22%)
		41-50	2 (12%)	0 (0%)
		Above 50	0 (0%)	0 (0%)
	Position	Main leaders	0 (0%)	0 (0%)
		Senior management	0 (%)	0 (0%)
		Middle management	0 (0%)	0 (0%)
		Ordinary employees	56 (54%)	46 (46%)
Percentage of new employees		44%	38%	
Number and percentage of employee turnover	Gender	Male	37 (43%)	44 (59%)
		Female	13 (33%)	32 (70%)
	Age	Below 30	34 (59%)	62 (81%)
		30-40	16 (32%)	14 (38%)
		41-50	0 (0%)	0 (0%)
		Above 50	0 (0%)	0 (0%)
	Position	Main leaders	0 (0%)	0 (0%)
		Senior management	0 (0%)	0 (0%)
		Middle management	0 (0%)	0 (0%)
		Ordinary employees	50 (49%)	76 (77%)
Percentage of employee Turnover		40%	63%	

Occupational safety and health performance		2019	2018
Number and rate of work-related fatalities		0 (0%)	0 (0%)
Number of work injury		1	0
Lost days due to work injury		2	0
Absentee days		202.5	63

Staff training		2019	2018 ¹⁵	
Number of individuals trained ¹⁶	Gender	Male	87	97
		Female	39	59
	Position	Main leaders	2	0
		Senior management	11	0
		Middle management	10	12
Ordinary employees	103	144		
Percentage of trained employees	Gender	Male	100%	100%
		Female	100%	100%
	Position	Main leaders	100%	0%
		Senior management	100%	0%
		Middle management	100%	100%
Ordinary employees	100%	100%		
Average training time (hour)	Gender	Male	10.8	5.6
		Female	11.7	5.9
	Position	Main leaders	4	0
		Senior management	6	0
		Middle management	8.2	6.3
Ordinary employees	12	6.4		

Location of suppliers	2019	Percentage of suppliers implementing relevant practices ¹⁷
Mainland China	7	100%

¹⁵ The total number of trainees in 2018 was 156, which is greater than the total number of employees, as some of our employees attending the training left during the reporting period.

¹⁶ For 2019, breakdown of trainees by gender: male (69%) and female (31%); breakdown of trainees by position: main leaders (2%), senior management (9%), middle management (8%) and ordinary employees (81%).

For 2018, breakdown of trainees by gender: male (62%) and female (38%); breakdown of trainees by position: main leaders (0%), senior management (0%), middle management (8%) and ordinary employees (92%).

¹⁷ The Group selects suppliers in accordance with the "Social Accountability Management Handbook", the "Procurement Control Procedures" and the "SA8000 Standards for Social Responsibility".

"ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORTING GUIDE" CONTENT INDEX

Subject Areas	Contents	Page Index/Notes
A1 Emissions		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	11-14, 21
A1.1	The types of emissions and respective emissions data.	12, 22
A1.2	Greenhouse gas emissions in total and intensity.	12-13, 22
A1.3	Total hazardous waste produced and intensity.	13-14, 22
A1.4	Total non-hazardous waste produced and intensity.	13-14, 22
A1.5	Description of measures to mitigate emissions and results achieved.	12-13, 22
A1.6	Description of how hazardous and non-hazardous wastes are handled, reduction initiatives and results achieved.	10, 13-14, 22
A2 Use of Resources		
General Disclosure	Policies on the efficient use of resources.	10
A2.1	Direct and/or indirect energy consumption by type in total and intensity.	11, 22
A2.2	Water consumption in total and intensity.	22
A2.3	Description of energy use efficiency initiatives and results achieved.	10-11, 22
A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency initiatives and results achieved.	10, 22; The Group has no problems in obtaining water sources
A2.5	Total packaging material used for finished products and with reference to per unit produced.	11, 22
A3 The Environment and Natural Resources		
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	14
A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	14
B1 Employment		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	16-17, 21
B1.1	Total workforce by gender, employment type, age group and geographical region.	17, 23
B1.2	Employee turnover rate by gender, age group and geographical region.	17, 23
B2 Health and Safety		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	15, 21
B2.1	Number and rate of work-related fatalities.	15, 24
B2.2	Lost days due to work injury.	24

B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	15
B3 Development and Training		
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	15-16
B3.1	The percentage of employees trained by gender and employee category.	16, 24
B3.2	The average training hours completed per employee by gender and employee category.	16, 24
B4 Labour Standards		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	17, 21
B4.1	Description of measures to review employment practices to avoid child and forced labour.	17
B4.2	Description of steps taken to eliminate such practices when discovered.	17
B5 Supply Chain Management		
General Disclosure	Policies on managing environmental and social risks of the supply chain.	18-19
B5.1	Number of suppliers by geographical region.	19, 24
B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	19, 24
B6 Product Responsibility		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	18, 21; Operation of the Shenzhen Plant does not involve advertising
B6.1	Percentage of the total number of products sold or shipped that have to be recalled for safety and health reasons.	18
B6.2	Number of products and service-related complaints received and how they are dealt with.	18
B6.3	Description of practices relating to observing and protecting intellectual property rights.	18
B6.4	Description of quality assurance process and recall procedures.	18
B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	18
B7 Anti-corruption		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	19, 21
B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	19
B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.	19
B8 Community Investment		
General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	20
B8.1	Areas of contribution, e.g. education, environmental issues, labour demand, health, culture, sports.	20
B8.2	Resources contributed to the focus area, such as money or time.	20