



**ZZ CAPITAL INTERNATIONAL LIMITED**

**中植資本國際有限公司**

(Incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立的有限公司)

Stock Code 股份代號：08295



**2019/2020**

ENVIRONMENTAL, SOCIAL AND  
GOVERNANCE REPORT

環境、社會及管治報告

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# 1 報告簡介 About the Report

## 1.1 Introduction of the Report

ZZ Capital International Limited 中植資本國際有限公司 (the "Company" ) and its subsidiaries (together referred to as the "Group") are pleased to present its fourth Environmental, Social and Governance ("ESG") report (the "Report"). This Report summarizes the environmental and social impacts, policies and initiatives of the Group during the financial year of 2019/2020 which began on 1 Apr 2019 to 31 Mar 2020 to demonstrate the Group long-term commitment in ensuring that its business is economically, socially and environmentally sustainable.

In preparing this Report, the Group has complied with the "Comply or Explain" provisions in accordance with the Environment, Social and Governance Reporting Guide (the "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") and in accordance with the practical circumstances of the Company.

The board (the "Board" ) of directors ( "Directors" ) of the Company acknowledges its responsibility for ensuring the integrity of the ESG Report and to the best of its knowledge, this Report addresses all material issues in respect of the Group's ESG obligations and fairly presents the ESG performance and commitment of the Company. The Board confirms that it has reviewed and approved the Report.

## 1.2 Business of the Group

The Company is a Hong Kong-based investment holding company. Its subsidiaries are principally engaged in the provision of corporate advisory services, investment advisory and assets management services, proprietary investments and money lending. The Group mainly operates businesses in Hong Kong and Mainland China markets.

## 1.3 Reporting Scope

The scope of this Report includes the environmental and social performance of the main operations of the Group in Hong Kong. All the information in the Report reflects the performance of the Group in environmental management and social responsibility from 1 April 2019 to 31 March 2020.

For details of the Group's corporate governance, please refer to the Corporate Governance Report contained in the Group's 2019/2020 Annual Report.

## 1.1 報告簡介

ZZ Capital International Limited 中植資本國際有限公司 (「本公司」) 及其附屬公司 (統稱「本集團」) 欣然提呈第四份環境、社會及管治 (「環境、社會及管治」) 報告 (「本報告」)。本報告概述本集團於 2019/2020 年財政年度 (即自 2019 年 4 月 1 日起至 2020 年 3 月 31 日止期間) 的環境、社會影響以及政策及倡議，以表明本集團確保業務在經濟、社會及環境方面實現可持續發展的長期承諾。

在編製本報告時，本集團已遵照香港聯合交易所有限公司 (「聯交所」) GEM 證券上市規則 (「GEM 上市規則」) 附錄二十所載之《環境、社會及管治報告指引》(「指引」) 的「不遵守就解釋」條文，並已結合本公司的實際情況。

本公司董事 (「董事」) 會 (「董事會」) 明白其為確保環境、社會及管治報告的完整性所負有的責任。盡其所知，本報告包含有關環境、社會及管治責任的所有實質性議題，並公平展示了本公司於環境、社會及管治方面的表現及承擔。董事會確認其已審閱及批准本報告。

## 1.2 集團業務

本公司作為一家香港投資控股公司，其附屬公司主要從事提供企業顧問服務、投資顧問及資產管理服務、自有資金投資及借貸。本集團主要在香港及中國大陸經營業務。

## 1.3 報告範圍

本報告的範圍包括本集團在香港的主要業務的環境及社會表現。本報告中的所有信息均反映了本集團在2019年4月1日至2020年3月31日期間在環境管理和社會責任方面的表現。

有關本集團企業管治的詳情，請參閱載於本集團2019/2020年報中的企業管治報告。

## 1.4 Sources of Information

The information disclosed in this Report is mainly sourced from internal files of the Company and public information in the market. All information contents have been reviewed and confirmed by the Group's management and the departments in charge.

## 1.5 Feedback

This Report is available in English and Traditional Chinese for readers to refer to, and based on environmental protection considerations, we recommend reading the electronic version of the Report, which is available in the "Financial Statements/Environment, Social and Governance Information" category of the Stock Exchange's website or on the Group's website. We welcome readers to contact us through the following contact methods. Your comments will assist us in further refining this Report and enhancing the Group's overall environmental, social and governance performance.

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## 1.4 資訊來源

本報告內所披露的資訊，主要來源為本公司內部檔案及市場公開資料。所有資訊內容均經過本集團管理層和主管部門審閱及確認。

## 1.5 反饋

本報告提供英文及繁體中文版本供讀者查閱。基於環保理由，我們建議瀏覽本報告的電子版本，而本報告的電子版本可在聯交所網站「財務報表 / 環境、社會及管治資料」類別或本集團網站查閱。我們歡迎讀者透過以下途徑與我們聯繫。閣下的意見將可協助我們進一步完善本報告以及提升本集團的整體環境、社會及管治表現。

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## 2 本集團的環境、社會及管治方法 ESG Approach of the Group

The Group considers good ESG governance as an integral part of the sustainable growth of enterprises. The Board of the Company thereby bears the primary responsibilities for formulating the Group's short-term and long-term ESG strategies, and continually oversees and reviews the implementation of the ESG policies, so as to strengthen the Group's ESG system and minimize related risks. The Board has delegated an authority to carry out sustainable development measures and to ensure compliance with the relevant laws and regulations.

The Group has established its internal organizational structure and methodology for ESG work to fully implement ESG management requirements.

During the reporting period, the Group continued to focus on ESG risks in operation. Guided by the Board of Directors, the Hong Kong head office was primarily responsible for our ESG performance and reporting, and the functional departments were responsible for implementation of ESG measures and data collection.

本集團認為良好的環境、社會及管治是企業可持續增長不可或缺的一部分。因此，董事會承擔制定本集團短期和長期環境、社會及管治戰略的主要責任，並不斷監督和審查環境、社會及管治政策的執行情況，以加強本集團的環境、社會及管治系統並降低相關風險。董事會已授權執行可持續發展措施並確保遵守相關法律和法規。

本集團已建立其內部組織架構和方法，以全面執行環境、社會及管治管理要求。

本報告期內，本集團繼續關注經營中的環境、社會及管治風險。在董事會的指導下，香港總部主要負責我們的環境、社會及管治績效和報告，職能部門負責實施環境、社會及管治措施和數據收集。

<b>The Board</b>	<b>董事會</b>
Leading environmental, social and governance management	引導環境、社會及管治的管理
<b>Hong Kong Head Office</b>	<b>香港總部辦公室</b>
Monitoring ESG performance. Coordinating the compilation of ESG report	監督環境、社會及管治方面的績效 協調環境、社會及管治報告的編制
<b>Functional Departments</b>	<b>功能部門</b>
Assisting the integrated implementation of ESG measures and data collection	協助整合實施環境、社會及管治措施和數據收集

In the reporting period, our management focused on the following ESG issues:

- **Responsible investment** - the Group has an investment policy and the Company's management is responsible for the effective management of the integration of ESG matters into the investment decision-making process. The Group also ensures that proper procedures are in place to meet the obligations outlined within the investment policy.
- **Compliance** - managing issues and ensuring our services and investment products comply with the relevant laws, rules and regulations.
- **Information security and data privacy** - improving the current data privacy policy of the Group by defining rules and principles for collecting and processing personal data, covering due care, purpose, limitation, authorization, choice and consent.

於本報告期內，我們的管理層專注於以下環境、社會及管治問題：

- **負責任的投資** – 本集團制定了投資政策，並且公司管理層負責把環境、社會及管治整合進投資決策過程內。本集團亦確保制定適當程序以履行投資政策內概述的責任。
- **合規** – 通過管理確保我們的服務和投資產品符合相關法律、法規和規則。
- **信息安全和數據隱私** – 通過重新定義收集和處理個人數據的規則和原則，改善本集團當前的數據隱私政策，涵蓋數據保護、目的、限制、授權、選擇和同意。

### 3 持份者交流 Materiality Assessment

The Group deeply understands the importance of close communication with stakeholders. The preparation of the ESG Report, which included the participation of different stakeholders, has helped us to review our current management on the environmental and social performance, and has also served as a basis for the formulation of our sustainability strategies. In order to understand the stakeholders' expectations and requirements, the Group has established various channels to collect comments regarding its ESG performance and address their reasonable expectations.

本集團深明與持份者保持緊密溝通的重要性。環境、社會及管治報告的編製包括了不同持份者的參與，有助我們審視我們現時對環境及社會表現的管理，並為建構可持續發展策略奠定基礎。為了解持份者的期望及要求，本集團已設立各種渠道收集有關其環境、社會及管治表現的意見並回應彼等的合理期望。

Stakeholder Groups 持份者團體	Expectations and Requirements 期望和需求	Engagement Method 交流模式
Shareholders 股東	Investment returns 收益回報 Operational compliance 合規營運 Growth in corporate value 企業價值提升 Information transparency and effective communication 資訊透明及有效溝通	General Meetings 股東大會 Announcements 公告 Email, telephone communication and company website 電郵、電話溝通及公司網站
Customer 客戶	Responsible investment 負責任投資 Quality investment product 優質投資產品 Performance of contracts 依法履約 Operation with integrity 誠信經營	Business relationship 業務關係 Account Management 帳戶管理 Conference and events 會議和活動
Regulators 政府及監管機構	Compliance with finance policies, laws and regulations 遵守金融政策、法律及法規 Responsible investment 負責任投資	Correspondence with regulators from time to time 定期與監管機構通訊 Regular Review 定期複查
Employees 員工	Remunerations and benefits 薪酬福利 Career development 職業發展 Care for employee 關懷員工 Health and safety 健康與安全	Annual appraisal meetings 年度評估會議 Open-door approach 門戶開放政策 Periodic team events 定期團隊活動 Weekly meetings 週會
Business Partners 業務夥伴	Operational with integrity 誠信經營 Fair competition 公平競爭 Mutual benefits 互惠互利	Business communication 業務溝通 Engagement and cooperation 參與合作

## 4 實質性分析 Social - Operating Practices

The Group uses findings from its stakeholder review to help determine issues of importance both to the Company and its stakeholders. Each year, these issues are plotted on a matrix, which forms a basis for the Group's ESG reporting and helps define the company's approach to emerging risks and opportunities. The matrix also reflects information from a number of other sources, including internal interviews with members of the company's management and other senior managers.

本集團利用持份者審查的結果來幫助確定對本公司及其持份者重要的議題。這些議題每年都被繪製在一個矩陣上，該矩陣構成了本集團環境、社會及管治報告的基礎，並協助本公司定義應對新的風險和機遇的方法。該矩陣還反映了一些其他來源的資訊，包括對本公司管理層和其他高級管理人員的內部訪談。

The result from the materiality assessment has been mapped and presented as below.

實質性評估的結果如下所示。



## 5 社會 – 營運慣例 Social - Operating Practices

### 5.1 Product Responsibility

The Group is convinced that maximizing value for customers is the only way to gain long-term trust and support. The Group follows the principle of prudent investment and adopts a relatively conservative investment strategy, in order to ensure the healthy development of our investment business.

The Group's investment philosophy includes intensive fundamental research, a thorough understanding of risk versus reward and active management with, what the Group believe, to be superior investment opportunities and trade executions.

The Group's investment manager uses a proprietary active portfolio management system to strategize and blend its capabilities through solutions business that focuses on outcome orientated investment. Investment strategies of different asset classes will be adopted according to the risk appetite and investment experience of different clientele.

The Group has formulated standards for asset management marketing practices, which include the principles of true, clear and accurate information on investment styles and philosophies, which specifies that:

- Employees must not, either by their action or statements, seek to mislead the market or customers.
- When providing financial services to a customer, appropriate action shall be taken to ensure that the customer received information that is necessary.

During the reporting period, the Group did not find any irregularities cases related to investment products and services.

#### 5.1.1 Customer Satisfaction and Services Complaint Handling

The Group positive reputation is built on the trust that customers, investors, employees and the community have on the Group's integrity. The trust depends on the quality of the Group's product and service, the way the Group informs and advises its customers.

A responsible approach to sales is more likely to lead to customer satisfaction. In turn, satisfied customers are loyal customers and are more willing to recommend the Group's financial services and investment products.

### 5.1 產品責任

本集團深信，最大限度地为客戶創造價值是獲得長期信任和支持的唯一途徑。本集團遵循審慎投資的原則，採取相對保守的投資策略，以確保投資業務的健康發展。

本集團的投資理念包括深入的基礎研究，對風險與回報的透徹理解以及積極的管理。本集團相信，這些都是把握卓越投資機會和交易執行的前期籌備過程。

本集團的投資經理使用專業的投資組合管理系統，通過專注於以結果為導向的投資解決方案來制定戰略並根據不同客戶的風險偏好和投資經驗，採用不同的投資策略。

本集團已制定了資產管理營銷實踐標準，其中包括傳達真實、清晰和準確的投資風格和理念信息的原則，該原則規定：

- 員工不得通過其行為或言論誤導市場或客戶。
- 向客戶提供金融服務時，應採取適當行動，確保客戶收到必要的信息。

本報告期內，本集團未發現與投資產品和服務有關的違規案件。

#### 5.1.1 顧客滿意度與服務投訴處理

本集團的聲譽建立在客戶、投資者、員工和社區對本集團誠信的信任上。信任取決於本集團產品和服務的質量，以及本集團通知和建議客戶的方式上。

一套負責任的銷售方法更有可能令客戶滿意。反過來，滿意的客戶是忠誠的客戶，更願意推薦本集團的金融服務和投資產品。



The Group measures customer satisfaction through customer feedback. Complaints are another important source of customer feedback and the Group analyses them closely to identify potential improvements. The Group has adopted a Group-wide quality standard for handling complaints are met and that customers are treated fairly. During the reporting period, no customer complaints were received.

### 5.1.2 Customer Data Privacy

The Group is committed to ensuring the security and protection of all the personal information the Group holds in line with its obligations under the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong).

The Group collects sensitive information where required by law or where the Group has permission to collect it. The Group is committed to good privacy practice and the Group's privacy policy sets out the approach to privacy management. It includes details regarding the types of personal information collected, and how it may be used and disclosed. No significant complaints regarding breaches of customer privacy or loss of customer data occurred during the reporting period.

The Group aims to ensure that every employee plays an active role in protecting data against loss or unauthorized access. The Group therefore provides training to employees every year regarding data security.

The Group addresses data security risk through a variety of measures, including:

- conducting operational risk coverage reviews across the organization;
- employee and customer due diligence procedures; and
- trainings for employees.

During the reporting period, the Group did not discover any circumstance of customers' personal data being stolen, altered, damaged or leaked.

本集團通過客戶反饋來衡量顧客滿意度。投訴是客戶反饋的另一個重要來源，本集團會對其進行仔細分析，以確定潛在的改進機會。本集團採用了適用於整個集團的質量標準來處理投訴，並公平對待客戶。本報告期內，並未收到客戶投訴。

### 5.1.2 客戶數據私隱

本集團承諾根據《個人資料(私隱)條例》(第486章)所承擔的義務確保本集團所持有的所有個人資料的安全及保護。

本集團在法律要求或本集團有權收集之情況下收集敏感資訊。本集團致力於良好的隱私實踐，本集團的隱私政策規定了隱私管理的方法，包括管理收集到的個人資訊類型以及如何使用和披露相關資訊。在本報告所述期間，沒有發生任何關於侵犯客戶隱私或遺失客戶數據的重大投訴。

本集團旨在確保每位員工在防止資料丟失或未經授權獲取資料等方面發揮積極作用。因此，本集團每年都為員工提供資料安全的培訓。

本集團通過各種措施預防資料安全風險，包括：

- 在整個組織內進行操作風險整體審查；
- 建立員工和客戶盡職調查程序；以及
- 員工培訓。

本報告期內，本集團未發現客戶個人資料被盜、修改、損壞或洩露的情況。

## 5.2 Anti-Corruption

Integrity and honesty are fundamental to building relationships of trust. This means conducting the Group's business with arm's length transparency in every single transaction.

The Group has detailed procedures in place to deal with incidents of fraud, corruption, bribery, money laundering and other malpractice. The Group sets out clear rules and guidelines in its Code of Conduct, which applies to all employees. All employees must comply with the requirements as specified in the employee handbook. It is supported by training and communication program available to all employees.

Unethical or fraudulent behavior is generally prohibited. Directors, employees and other representatives are required to adhere to the anti-corruption policy as a condition of their employment and engagement to the Group.

In addition, the Code of Conduct clearly states that employees shall act honestly and professionally with the client's best interests and in line with market expectations on integrity. Conflict of interests will be avoided to the largest extent and potential conflicts with clients will be disclosed if unavoidable.

The Group's guideline complies with various relevant applicable legislation and codes including but not limited to: Code of Conduct for Persons Licensed by or Registered with the Securities and Futures Commission; Anti-Money Laundering and Counter-Terrorist Financing Ordinance ( "AMLO" ), Guideline on Anti-Money Laundering and Counter-Financing of Terrorism etc.

For corporate gift and hospitality, employees are required to comply with specific procedures and gain appropriate approval prior to giving and receiving corporate gifts and hospitality.

The Group encourages employees to report known or suspected misconduct under the Group's Code of Conduct. Employees can make the report directly to the assigned compliance officer or escalate the matter to the senior management. Reports can also be made anonymously through a whistle-blower mechanism by mail, electronic mail or phone.

During the reporting period, the Group complied with relevant laws and regulations relating to bribery, extortion, fraud and money laundering. And there were no confirmed incidents or public legal cases regarding corruption in relation to the Group.

## 5.2 反貪污

正直和誠信是建立信任關係的基礎。這意味著本集團在每一筆業務交易中都要合理透明地開展。

本集團制定了詳細的程序，以處理欺詐、腐敗、賄賂、洗錢和其他舞弊事件。本集團在其行為準則中制定了明確的規則和準則適用於所有員工。所有員工必須遵守員工手冊中規定的要求，並可通過培訓和溝通計劃獲得支持。

不道德或欺詐行為是被禁止的。董事、員工和其他代表必須遵守本政策，作為其受僱和加入本集團的條件。

此外，行為準則還明確規定，員工應為實現客戶最大利益和滿足市場對誠信的期望，誠實及專業地行事。員工應盡量避免利益衝突，如不可避免，應披露與客戶的潛在衝突。

本集團的指引符合各項相關適用法律及守則，包括《證券及期貨事務監察委員會持牌人或註冊人操守準則》、《打擊洗錢及恐怖分子資金籌集條例》、《反洗錢及反恐融資指引》等。

對於公司禮品和招待，員工在贈予和接受公司禮品和招待之前，必須遵守特定程序並獲得批准。

本集團鼓勵員工根據本集團行為準則舉報已知或可疑的不當行為。員工可以直接向指定的監察主任提交報告，或將問題上報給高級管理層，也可以通過信件、電子郵件或電話的舉報機制匿名舉報。

本報告期內，本集團遵守了有關賄賂、敲詐勒索、欺詐和洗錢的法律法規，而且沒有與本集團有關的腐敗事件或公共法律案件。

### 5.3 Supply Chain Management

As a financial services provider, the Group's supply chain is primarily related to products and services that support its operations. This includes facility services, IT systems, business travel, marketing and communications support, and other professional services.

To ensure compliance with the Group's procurement policy, the Group requires procurement which amount over certain thresholds to provide at least two sources of quotation in a fair and open manner for selection. The Group assess suppliers and business partners with a focus on reliability, professionalism, delivery time, quality and value for money.

In addition, in order to maintain the quality of goods and services procured, the list of approved vendors is reviewed annually and will be placed against competitive bids if vendors' performance or quality falls short of the requirements set out by the Group.

During the reporting period, the Group had a total of 22 suppliers and all of them were local suppliers.

### 5.3 供應鏈管理

作為一家金融服務提供者，本集團的供應鏈主要與支持運營的產品和服務相關。這包括設施服務、IT 系統、商務旅行、行銷和通信支持以及其他專業服務。

為確保符合採購政策，本集團要求當採購金額超過一定額度時，採購人員應以公平、公開的渠道提供至少兩個報價來源供選擇。本集團評估供應商和業務夥伴的重點是可靠性、專業性、交付時間、質量和性價比。

此外，為了保證採購的貨品和服務的質量，本集團每年都要對核實過的供應商名單進行審查。如果供應商的表現或質量達不到本集團規定的要求，本集團將通過競爭性投標替換該供應商。

本報告期內，本集團共有22家供應商，均為本地供應商。

## 6 僱傭和勞工慣例 Social - Employment and Labour Practices

### 6.1 Employment

The Group is committed to provide a rewarding work environment that encourages collaborations and offer its employees opportunities to learn, grow and succeed at work and in life. This commitment is incorporated into the Group's human resources ("HR") policy and employment contract.

The Group adheres to the principles of fairness in the provision of employment opportunities, remuneration, training, performance evaluation and promotion without any forms of discrimination such as gender, age, ethnicity, religion and culture. The Group is committed to creating a fair and harmonious working environment.

The Group has formulated a human resource strategy to retain and recruit talents in a competitive market. The HR department of the Group develops recruitment plans in accordance with the recruitment needs of various departments, and continuously introduce talents to join the Group through social recruitment, campus recruitment, internal referral and other channels. The HR department of the Group strictly implements the recruitment evaluation program, adheres to the selection principle of fairness and selection of high calibre, and provides equal job opportunities in accordance with their competence and abilities. The Group enters into employment contracts with the employees in accordance with the requirements of the Employment Ordinance, covering matters such as wages, benefits, working hours, rest periods, safety and sanitary conditions in the workplace, and terms for termination. The Group makes contributions to the Mandatory Provident Fund pursuant to the laws of Hong Kong.

The Group is committed to implementing the remuneration distribution principals based on performance, efficiency and fairness. On top of employee's basic salary, the Group may pay performance bonuses in accordance with employees' performance and the Group's business performance. In order to maintain a competitive remuneration package, the Group carries out evaluation and adjustment on remuneration every year with reference to the social average wage, the consumption level and the industry rate, so as to attract and retain talents.

The Group actively advocates work-life balance and offers a diversified range of welfare and caring policy to our employee, including holding an Annual Dinner and meal gatherings, offering customary benefits such as mooncakes, early release before the festivals as well as providing the marriage leaves and community service leave.

During the reporting period, the Group did not discover any material non-compliance or any violation of employment laws and regulations.

### 6.1 僱傭

本集團致力為員工提供一個具有推動力及滿足感的工作環境，鼓勵員工彼此合作，讓員工在工作及生活中學習及成長，達成成功。此承諾已納入本集團人力資源政策和僱傭合同內。

本集團在提供就業機會、薪酬、培訓、業績評估和晉升方面堅持公平原則，不存在性別、年齡、族裔、宗教和文化等任何形式的歧視。本集團致力於創造公平和諧的工作環境。

本集團制定了人力資源戰略方案，以在競爭激烈的市場上留住和招聘人才。本集團的人力資源部根據各部門招聘需求制定招聘計劃，通過社會招聘、校園招聘、內部推薦等渠道不斷引進人才加入本集團。本集團的人力資源部嚴格執行招聘評估程序，堅持公平擇優的原則，根據候選人的能力提供平等的工作機會。本集團根據僱傭條例的規定，與僱員訂立僱傭合約，合約內容包括薪酬、福利、工作時間、休息日、工作場所的安全及衛生條件，以及終止僱傭合約的條款。本集團根據香港法律提供強制性公積金供款。

本集團承諾執行基於績效、效率和公平的薪酬分配原則。在員工基本工資的基礎上，本集團可根據員工的表現和本集團的經營業績發放績效獎金。為保持有競爭力的薪酬待遇，本集團每年參照社會平均工資、消費水平和行業薪酬水平，對員工薪酬進行評估和調整，以吸引和留住人才。

本集團積極倡導工作及生活平衡，因此，我們為員工提供多元的福利及關懷政策，包括舉行年度晚宴及節日聚餐、安排傳統應節食品如月餅、節日前提早下班、提供結婚假及義工假期等。

在本報告期內，本集團未發現任何重大違規或違反僱傭法律及法規的情況。

### 6.1.1 Employee Profile and Employee Turnover

The Group commitment is to support the local community by hiring local employees. The vast majority of the Group's employees are locals. The Group is committed to fair employment practice and equal opportunities. We respect the religious beliefs, political stances, ethnicity or sexual orientation of all our employees and candidates, and ensure that they will not be discriminated against because of differences in race, disability, gender, marital status and age.

The employee turnover rate refers to the percentage of employees who leave an organisation during a certain period of time. It usually includes voluntary resignation, dismissals, and retirements in the calculation. Employee turnover rates can vary widely across industries. During the reporting period, the Group's employee turnover rate is 54%. The reason for the high turn-over rate is due to reorganization. Moreover, the global growth remains subdued and some employees were pursuing new opportunity. As of the end of the reporting period, the Group had 23 employees. Employee distribution were as follows:

### 6.1.1 員工分析及流失比例

本集團的承諾是通過僱用當地員工來支援當地社區。絕大部分的員工為本地人。本集團矢志履行公平僱傭慣例及平等機會。我們尊重全體僱員及應聘者之宗教信仰、政治立場、種族及性取向，亦確保彼等不會因種族、殘障、性別、婚姻狀況及年齡之差異而受歧視。

員工流失比率是指在某一時間內離開組織的僱員比例。在計算中通常包括自願辭職，解僱和退休。不同行業的員工流失率差異很大。本報告期內本集團員工流失率為54%。員工流失的主要原因是公司重組，以及全球增長仍然疲弱，部分員工正在尋求新的機會。截至本報告期末，本集團共有員工23名。員工分佈如下：



#### By Ages 按年齡



#### By Employment Mode 按僱傭模式



#### By Location 按地方



## 6.2 Health and Safety

The Group depends on a healthy workforce and the Group supports its employees through a range of initiatives that create a productive and health-promoting workplace. The Group offers a variety of activities and resources that support employees to prioritize health and safety. The Group believes all accidents and injuries are preventable and the Group is driving a culture where safety is an integral part of its decision making across the Group.

The Group focuses on two major areas to minimize health hazards:

- Occupational health management; and
- Work safety at the office, including fire protection measures.

Although the nature of jobs in the Group are low-danger positions, the Group does not take this lightly. The Group evaluates and identifies the risk of safety in its premises and precautionary measures are recommended accordingly. For example, regular checks will be conducted on first aid kits and fire services equipment to ensure they are placed in a prominent position and are checked regularly and restocked if any items are damaged or are out of date.

For fire prevention, the Group participates in fire drills organized on regular basis by the building management every year.

As the Group's Hong Kong head office is located in the Hong Kong Central district, the Group checked staff body temperature daily. The Group offered staff flexible working hours and working from home practice to avoid travelling during peak hours and reduce travelling altogether during Hong Kong social protests and the COVID-19 pandemic. The Group also provides transportation allowances to employees to take taxis travel to and from work during the COVID-19 outbreak to avoid crowds.

Other measures imposed by the Group to minimize the chance of staff being infected by COVID-19 in office area:

- Provide adequate hand hygiene facilities, such as 75% alcohol-based hand-rub to staff and also in public areas, for example at the reception counter; and
- Provide one surgical mask to staff per day

### Occupational Health and Safety Data 職業健康及安全數據

Work related fatality 與工作有關的死亡人數	0
Lost days due to work injury 工傷所致缺勤天數	0

The Group is in strict compliance with relevant safety laws and regulations. During the reporting period, there was no legal complaint for violating laws and regulations relating to occupational safety.

## 6.2 健康與安全

為確保全體員工能夠享有健康及安全的工作場所，本集團透過一系列的舉措，建設一個具效力及安全的工作間。本集團亦提供各種活動和資源，支持員工重視健康與安全。本集團相信所有事故及傷害均可預防的，我們積極推廣職場安全，亦為整個集團作決策時非常重視的部份。

本集團專注於兩個主要領域，以盡量減少健康危害：

- 職業健康管理；和
- 辦公室的工作安全，包括防火措施。

雖然本集團的工作性質屬於低風險職位，但本集團並未輕視這一點。本集團評估及識別其處所的安全風險，並據此建議採取預防措施。例如，將對急救箱和消防設備進行定期檢查，以確保將它們放置在顯眼位置，定期檢查並在任何物品損壞或過期時進行補貨。

防火方面，本集團每年參與由樓宇管理人員定期舉辦的消防演習。

由於本集團的香港總部位於香港中區，因此本集團每天檢查員工體溫。本集團為員工提供彈性的工作時間和在家上班的方式，讓員工可避免在繁忙時段上班以及在香港社會抗議活動和新型冠狀病毒大流行期間出行。本集團更向員工提供交通津貼以補貼員工於疫情下上班和下班乘坐的士以避開人流。

為了盡量減少員工在辦公室區域被新型冠狀病毒感染的機會，本集團採取了如下的措施：

- 在公共區域，如前台接待處和為每個工作人員處提供足夠的帶有75%的酒精洗手液；及
- 每天為員工提供一個口罩。

本集團嚴格遵守相關安全法律及法規。本報告期內，概無違反職業安全法律及法規的法律申索。

### 6.3 Development and Training

In the face of a rapidly changing context, ensuring that the employees continuously develop their skills and have the opportunity to reach their full potential are the key to our sustainable business growth. Therefore, the Group provides regular trainings to employees at all levels. Topics covered sales skills, investment restrictions, insider dealing, AML, market manipulation, counter-terrorism financing, project management and coaching etc.

For the new joiners, they will take up orientation in their first working day to equip them with necessary information about the Group. Continuing educations are also encouraged by the Group, all employees are entitled study leaves to participate in the seminars, workshops or short-courses that are relevant to their job duties in order to obtain latest market info and up-to-date skills. The Group's licensed individuals (Licensed Representatives and Responsible Officers) must adhere to the Securities and Futures Commission CPT requirements to undertake a certain number of CPT hours per year on the relevant topics relating to their regulated activities.

Employees are offered the opportunities to be involved in a wide range of activities and situations which develop knowledge, skills and experience. This environment enables employees to build and grow capabilities across functions and teams.

In addition, the Group keeps employees up to date on company strategy, internal news and events via email, bulletin and internal meetings. Through this sharing, the Group promotes best practices. The Group also assesses how effective employees are and whether they are making the best use of their skills in their current role.

During the reporting period, 50% of the employees undertook the trainings including senior-level employees and they have completed an average of 5.7 training hours annually. The average training hours completed by male employees was 5 hours and for female employees, the average training hours was 7.33 hours.

### 6.4 Labour Standard

The Group strictly abides by the relevant employment and labour laws and regulations, we are committed not to engage in the use of child labour and forced labour. The Group ensures that all employees have reached the minimum statutory age for employments, provide their services willingly and enjoy their fundamental rights as a labour. The Group has insisted on monitoring the recruitment process frequently to prevent the occurrence of illegal conduct.

The Group's Code of Conduct and employment contract sets out its general approach regarding labour standards. In addition to the Code of Conduct, the human resource policy also covers the labour standard. The policy provides the framework of rules applicable to all HR activities within its operations.

During the reporting period, the Group did not discover any material non-compliance of labour rights and labour related laws and regulations.

### 6.3 發展和培訓

面對瞬息萬變的環境，深信員工發展對本集團的可持續業務發展至為關鍵，我們推動員工持續不斷的發展自己的技能，以提升工作上的表現。因此，本集團定期對各級員工進行培訓。培訓主題涵蓋銷售技巧、投資限制、內幕交易、反洗錢、市場操控、反恐籌資、項目管理及輔導等。

新入職的員工將在第一個工作日接受新員工入職培訓，以獲取有關本集團的必要資訊。本集團還鼓勵持續進修，所有員工都享有學習假期的福利，參加與其工作職責相關的研討會、工作坊或短期課程，以獲得最新市場資訊及技能。本集團的持牌人（持牌代表及持牌負責人）必須遵守證券及期貨事務監察委員會持續專業培訓（“CPT”）要求，每年需修讀一定要求的CPT小時在有關受規管活動的主題培訓上。

員工有機會參與不同類型的活動，以增進其個人知識、技能和經驗，這都能讓員工具備多元的能力，同時亦培養跨職能的工作團隊。

此外，本集團通過電子郵件、公告以及內部會議向員工提供公司戰略、內部最新資訊。通過這種分享，本集團可推廣最佳實踐。本集團還會評估員工的工作效率，以及他們是否在當前的崗位上充分利用了自己的技能。

本報告期內，接受培訓的員工中50%為高級員工，平均每年完成5.7小時的培訓。男性員工平均完成培訓5小時，女性員工平均完成培訓7.33小時。

### 6.4 僱傭準則

本集團嚴格遵守相關僱傭條例及勞工慣例，堅決不使用童工及強制勞工。本集團確保所有僱員符合受僱之最低法定年齡，且均為自願提供服務，保障員工享有與僱傭條例相關的基本權利，並堅持密切監察招聘流程，防止出現違法行為。

本集團的行為準則和僱傭合同列出了有關集團的僱傭標準的一般條文。除了行為準則之外，本集團的人力資源政策也涵蓋了僱傭標準。該政策提供適用於本集團業務活動內所有人力資源的規則框架。

本報告期內，本集團沒有發現任何有關僱傭權利及僱傭相關法律法規的重大不合規情況。

## 7 環境 Environment

The Group directs environmental impacts predominantly related to the operation of tenanted offices and computer systems, air travel and the resources consumed by these activities. The Group strives to integrate resource efficiency and sustainability into the day-to-day operations of the Group's offices and corporate operations through the implementation of energy saving plan.

The Group is committed to reducing the impact the Group has on the environment through its business operations. The Group worked to minimize our impact in a number of ways, including the consideration of the office spaces they occupied. In January 2019, the Group relocated their Hong Kong head office to 8 Queen's Road, Central, an environmentally friendly building. The Group has also raised employee awareness of environmental issues through recycling initiatives.

During the reporting period, there was no material non-compliance with relevant laws and regulations relating to environment from the Group.

### 7.1 Emissions

The working environment of the Group's business are indoor office located in Hong Kong without any industrial plants and therefore, the type of emissions of the Group were limited to greenhouse gas ("GHG") emissions, non-hazardous waste, and wastewater discharge.

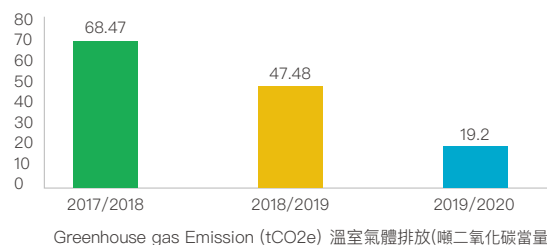
#### 7.1.1 Greenhouse Gas Emissions

The consumption of electricity at the Group's office was the primary source of our greenhouse gas emission ("GHG").

During the reporting period, the Group's GHG emissions equated to a total of approximately 19.2 tonnes of CO<sub>2</sub> equivalent ("tCO<sub>2</sub>e") and the detailed summary of the GHG emission is shown as below:

	2017/2018	2018/2019	2019/2020
Total Greenhouse Gas Emissions (tCO <sub>2</sub> e) 總溫室氣體排放 (每噸二氧化碳當量)	68.47	47.481	19.20
Greenhouse Gas Emissions Intensity (tCO <sub>2</sub> e/staff) 溫室氣體排放密度 (每噸二氧化碳當量/員工)	6.85	2.374	1.06

The significant drop of GHG emission this year is due to the Group has moved to a smaller office and also the Group devotes efforts to reduce the GHG emission in the office by reducing energy usage.



本集團的直接環境影響主要涉及租用辦公室和電腦系統的運營、航空旅行以及這些活動所消耗的資源。通過實施節能計劃，本集團努力將資源效率和可持續性融入本集團各辦事處和企業的日常運營中。

本集團承諾降低業務運營對環境的影響。本集團在許多方面努力將影響降到最低，包括考慮到所佔用的辦公空間。2019年1月，本集團將其香港總部遷往皇后大道中8號，該處是一座環境友好型建築。同時，本集團還通過回收活動提高了員工對環境問題的認識。

本報告期內，本集團沒有發生重大環境違法違規行為。

### 7.1 排放

本集團的辦公地點位於香港的室內辦公室，沒有任何工業廠房。因此，本集團的排放類型僅限於溫室氣體 (GHG) 排放、非危險廢棄物和廢水。

#### 7.1.1 溫室氣體排放

本集團辦公室的用電量是我們溫室氣體排放 ("GHG") 的主要來源。

報告期內，本集團的溫室氣體排放總量為19.2 噸二氧化碳當量 ("tCO<sub>2</sub>e")，溫室氣體排放的詳細匯總如下。

今年溫室氣體排放量大幅下降的原因是本集團已遷至規模較小的辦公室，集團還致力於通過減少能源使用來減少辦公室的溫室氣體排放。



### 7.1.2 Waste

Apart from reducing wastes from source, the Group supports the Recycling Scheme organized by the building management office of the head office. Under the Scheme, the Group also segregates fluorescent tubes, computers, electronic components, printer cartridges and water bottles for recycling.

During the reporting period, the Group's head office had recycled 116 bottles of distilled drinking water bottles.

For sensitive material, the Group used burn bags for special disposals. The burn bag is filled with documents containing sensitive information, sealed shut, and then picked up by hired vendor for tossed.

For non-disclosure of data of general waste and intensity, the relevant data was not available as the respective building management offices handled the waste disposals of the head office.

### 7.1.3 Waste water

The water consumption of the Group is mainly attributed to general office use which is mainly from toilets and waste water generated from the pantry. The office building management has installed dual flush toilets and sensor taps to reduce water consumption. The domestic sewage from our offices is directly discharged to the municipal drainage system.

## 7.2 Use of Resources

The main resources consumed during the Group's operation are paper, energy and water. To reduce paper use, the Group encourages employees to minimize the number of photocopies and adopt double-sided printing whenever possible. Waste paper collection boxes are also placed in the office to collect non-reusable waste paper for recycling. In terms of energy saving, the Group has selected energy-efficient printer models and encouraged employees to switch off the lighting and air conditioning when not in use to avoid energy wastage and minimize carbon emissions.

The Group's employees are also reminded of the importance of water conservation and encouraged to adopt water-saving measures, such as turning off faucets tightly after use, in order to avoid water wastage. The Group will keep on enhancing energy and water usage efficiencies, and hence to consume resources in a reasonable manner.

Due to the nature of our business and the industry, no packaging materials are used during our operations.

### 7.1.2 廢棄物

除減少源頭廢棄物外，本集團參與總部大樓的物業管理辦公室安排之回收計劃。根據該計劃，集團將熒光燈管、電腦、電子元件、墨盒和水瓶以進行回收。

本報告期內，本集團總公司回收了116瓶蒸餾空水瓶。

對於包含敏感資訊的資料，本集團使用焚燒袋進行特殊處理。焚燒袋裏裝滿了包含敏感資訊的檔案，密封好，然後由所聘用的供應商收集處理。

本集團所產生的廢棄物是由辦公大樓物業管理處處理的，故沒有披露相關廢棄物的總量和強度等數據。

### 7.1.3 廢水

本集團的用水量主要歸於一般辦公室用途，主要來自廁所以及茶水間所產生的廢水。辦公樓管理部門安裝了節水型馬桶和感應水龍頭，以減少用水量。我們辦公室的生活污水直接排入市政排水系統。

## 7.2 資源使用

本集團運營期間消耗的主要資源是紙張、能源和水。為減少用紙，本集團鼓勵員工盡量減少影印數量，並儘可能採用雙面打印。廢紙收集箱也放置在辦公室中，以收集不可重複使用的廢紙以進行回收。在節能方面，本集團選擇了節能打印機，並鼓勵員工在不使用時關閉照明和空調，以免浪費能源並減少碳排放。

本集團還提醒員工節水的重要性，並採取節水措施，例如在使用後關緊水龍頭，以免浪費水。本集團將繼續提高能源和水的使用效率，從而合理地消耗資源。

由於我們業務和行業的性質，我們在運營過程中不使用任何包裝材料。

## 7.2.1 Energy Consumption

Due to the Group's business nature, the level of energy consumption, such as electricity consumption and water consumption are considered relatively low, in particular our water consumption is very minimal. The electricity consumption is the largest sources of the Group's GHG emissions. As mentioned above, since the implementation of energy saving initiatives, the Group has managed to lower its electricity consumption accordingly.

During the reporting year, the Group's consumption in electricity was as below:

	2017/2018		2018/2019		2019/2020	
	Amount 總額	Intensity 強度 (kwh/staff 千瓦時/員工)	Amount 總額	Intensity 強度 (kwh/staff 千瓦時/員工)	Amount 總額	Intensity 強度 (kwh/staff 千瓦時/員工)
Energy 能耗						
Electricity Consumed 電力消耗	86,669 kWh 千瓦時	8,667 kWh 千瓦時	60,103 kWh 千瓦時	3,163.31 kWh 千瓦時	24,306 kWh 千瓦時	1,350.33 kWh 千瓦時

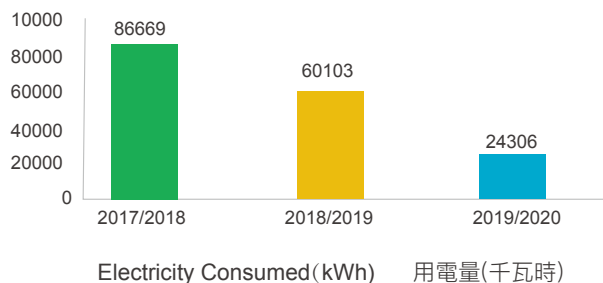
The Group has reduced the electricity consumption compared to the last reporting period, thus decreased the Scope 2 carbon emission. This reduction is the result of moving to a smaller office space and a continued focus on energy use in the office. Use of technology including the implementation of virtual conferencing software, continue to facilitate collaboration and help reducing the need for business travel.

## 7.2.1 能耗

由於本集團的業務性質，能源消耗水平，如電耗和水耗被認為相對較低，特別是水耗非常低。電力消耗是本集團溫室氣體排放的最大來源。如上所述，自實施節能措施以來，本集團相應降低了電耗。

報告年度內，本集團的電力消耗如下：

與上一報告期相比，本集團減少了用電量，從而減少了範疇2的碳排放。排放減少的主要原因是本集團遷移到較小的辦公空間，並繼續關注辦公室的能源使用。應用科技包括採用虛擬會議軟件，可持續促進協調關係，從而減少商務旅行的需求。



## 7.2.2 Water

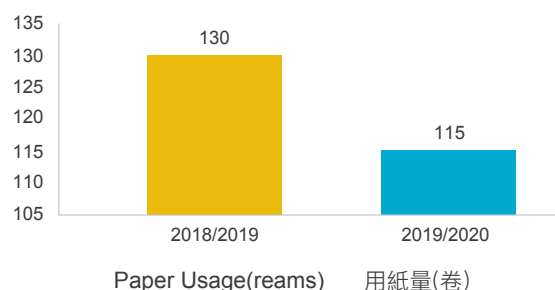
The Group's operations use relatively little water compared with other industries and the Group does not consider this to be material to its environmental impact. However, the Group recognizes that water is becoming an increasingly important issue. The property management where the Group office located has promoted water conservation and discussed to tenants in the building about the water saving initiatives.

## 7.2.2 水資源

本集團的業務與其他行業相比用水相對較少，本集團認為這對其環境影響不重大。但是，本集團認識到水資源正成為日益重要的議題。本集團辦公室所在的物業管理公司負責促進節約用水，並與大樓內的租戶討論節水措施。

### 7.2.3 Paper

The Group encourages to use electronic documents to replace hardcopies and to print with double-sided paper. The used single-sided paper is collected for reuse. By these measures, the paper usage of the Group was approximately 115 reams A4 paper during the reporting period.



### 7.2.3 用紙量

本集團鼓勵使用電子文件取代紙質文件及使用雙面紙張打印。我們收集使用過的單面紙張以重複使用。透過該等措施，本集團於報告期間的用紙量約為115卷A4紙。

## 7.3 The Environment and Natural Resources

The Group is well aware of its own environmental protection obligations. The Group has incorporated and implemented the 3Rs (Reduce, Reuse, and Recycle) principles into its daily operation, aiming to reduce the energy consumption, minimize the waste emission and improve the reuse rate of the A4 papers.

The Group introduced the electronic platform to process internal operations and approvals. An archiving server is also in place for documents storage to reduce the storage of documentation in paper format.

During the reporting period, the Group was not aware of any significant environmental impacts. The Group complied with all relevant environmental rules and regulations in Hong Kong.

## 7.3 環境和天然資源

本集團深知其自身的環保責任。本集團已將3Rs（減少，再利用及再循環）原則納入並實施於日常運作中，旨在減少能源消耗、減少廢物排放並提高A4紙的再使用率。

本集團引入電子平台以處理內部營運及審批程序。本集團更設有伺服器用於文件存儲，以減少紙質文件存儲。

本報告期內，本集團並未發現任何重大環境影響。本集團遵守香港所有相關環境規則及法規。

## 8 社會 – 社區 Social - Community

### 8.1 Community Investment

The Group believes that the healthy development of communities is conducive to both the community groups and the Group herself. To build a positive corporate culture and fulfil the Group's corporate social responsibility, the Group believes that the interests of the community where it operates should be prioritized as one of the essential tasks in its path towards sustainable development.

The Group is actively seeking opportunities to make contribution to the society and the Group has always encouraged its employees to participate in voluntary and charitable events to serve the community and society. The Group plans to implement more community service to reflect its responsibility towards the society.

By contributing resources and the employees volunteer time, the Group aims to address community concerns in collaboration with local government, non-profit organizations and partners.

During the reporting period, the Group continues to focus on the following area for our community investment:

- Provide helping hands for people in need
- Foster a healthy and green living environment in the community
- Support local charitable events
- Provide training opportunities for young people

### 8.1 社區投資

本集團認為，社區的健康發展有利於社區團體和集團本身。為了建立積極的企業文化並履行集團的企業社會責任，本集團認為，應將經營所在社區的利益放在首位，這是實現可持續發展道路上的基本任務之一。

本集團正積極尋求機會為社會作出貢獻，本集團一直鼓勵員工參與義工及慈善活動，服務社群。本集團計劃參與更多社區服務，回饋社會。

通過提供資源和員工志願者時間，本集團旨在通過與本地政府，非營利組織和合作夥伴的合作解決社區問題。

於報告期間，本集團繼續專注於以下有關我們的社區投資：

- 為有需要的人提供幫助
- 在社區中培養健康和綠色的生活環境
- 支持本地的慈善活動
- 為年輕人提供培訓機會

## 9 ESG Report Indexes 環境、社會及管治報告內容索引

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