



# GRAND T G GOLD HOLDINGS LIMITED 大唐潼金控股有限公司\*

(Incorporated in the Cayman Islands with limited liability)  
(於開曼群島註冊成立之有限公司)

(Stock Code 股份代號 : 8299)

ENVIRONMENTAL, SOCIAL  
AND GOVERNANCE REPORT

# 2020-21

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## OBJECTIVES

The board of directors (the “**Board**”) of Grand T G Gold Holdings Limited (the “**Company**”) is pleased to present the environmental, social and governance (“**ESG**”) report which is prepared in accordance with Environmental, Social and Governance Reporting Guide (the “**ESG Guide**”) set out in Appendix 20 to the GEM Listing Rules. The Board has reviewed and approved the report and is pleased to present the ESG performance and progress of the Company and its subsidiaries (collectively, the “**Group**”) for the year ended 31 March 2021.

The table below lists the ESG matters that are material for the Group and relevant to the ESG Guide:

ESG Guide	ESG matters relevant to the Group
A. Environmental	
A.1 Emissions	Carbon dioxide emissions and waste management
A.2 Use of resources	Energy and consumption
A.3 Environment and natural resources	Measures to reduce environmental impact
B. Social	
B.1 Employment	Labour practices
B.2 Health and safety	Workplace health and safety
B.3 Development and training	Employee development and training
B.4 Labour standards	Child labour and forced labour
B.5 Supply chain management	Supplier management
B.6 Product responsibility	Product safety and quality
B.7 Anti-corruption	Anti-corruption and money laundering
B.8 Community investment	Community involvement

## INFORMATION ABOUT THE GROUP

The principal activity of the Company is investment holding. Its subsidiaries are principally engaged in gold exploration, mining and mineral processing. To reduce environmental impact and create value for communities, the Group seeks every opportunity to incorporate sustainability standards and practices into all aspects of its businesses.

In addition, the Group treats social responsibility as its basic responsibility. In order to contribute to the society which the Group relies on, the Group actively participates in activities to help underprivileged communities.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## STAKEHOLDER ENGAGEMENT

Stakeholder engagement is the core element of the Group's sustainable development. Focusing on the establishment of a regular communication mechanism for the stakeholders, the Group has set up online and offline communication channels to demonstrate to the stakeholders its strategic plans for and performance of sustainable development and to consult their opinions and needs in a timely manner, so as to fulfil their expectations.

The Group's stakeholders include the shareholders, staff, government and regulatory authorities, customers, suppliers and communities, shareholders/institutional and individual investors, etc. The Group will engage in discussions with the stakeholders about relevant issues through various channels. The relevant communication channels and stakeholders' expectations and requirements for the Group are as follows:

Stakeholders	Expectations	Communications and feedbacks
Shareholders	Financial results Corporate transparency Sound control over risks	Growth in profitability Regular disclosure of information Optimisation of risk management and internal control
Staff	Platform for career development Salary and benefits Safe working environment	Promotion mechanism Competitive salaries and employee benefits Provision of employee training and improvement in safety awareness
Government and regulatory authorities	Compliance with rules and regulations Paying tax according to the law	Operational compliance Full payment of tax when due
Customers	Standards of logistics and delivery services Security of customer information Protection of customers' rights and interests	Monitoring of delivery status with the product tracking system Protection of customer privacy Marketing compliance
Suppliers	Cooperation with integrity Business ethics and creditworthiness	Establishment of a responsible supply chain Performance of contracts according to the law
Communities	Environmental protection Job opportunities	Use of environmentally friendly and energy-saving equipment Provision of job opportunities
Shareholders/institutional and individual investors	Annual general meetings and notices Regular corporate publications (including financial statements) Issue of circulars and announcements in due course	Platforms for communications with shareholders Results announcements Increase in transparency of corporate development

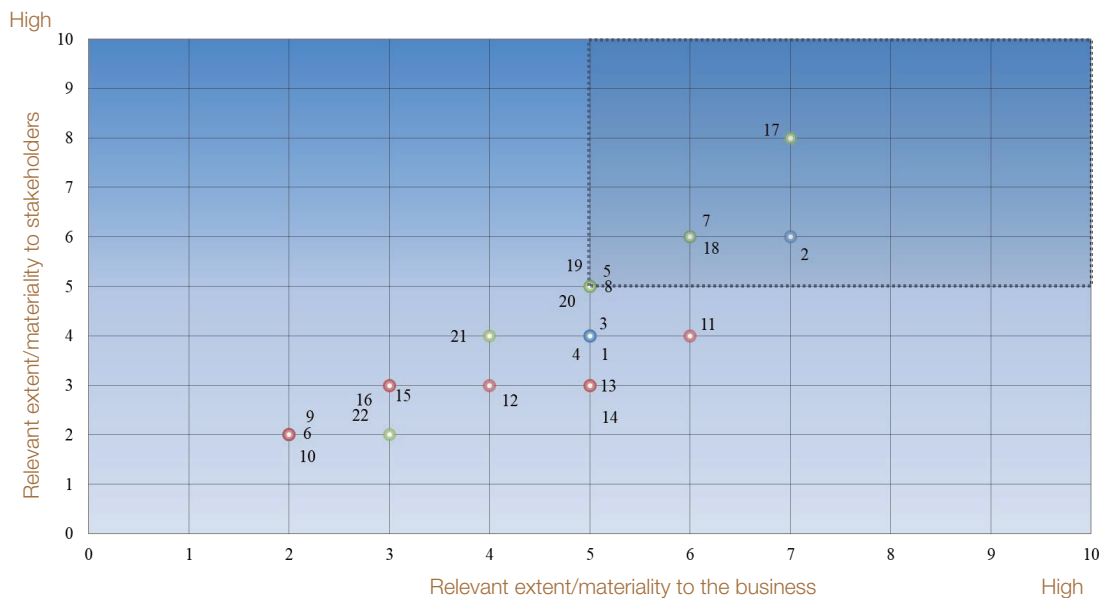
# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## MATERIALITY ASSESSMENT

For the year ended 31 March 2021, the Group conducted a comprehensive materiality assessment, which involved group discussions, interviews and questionnaire surveys with internal and external stakeholders to identify the environmental, social and operational issues which have the most significant impacts on the Company's business and the relevant issues which are of concern to the stakeholders.

With reference to the scope of disclosure as required under the ESG Reporting Guide, as well as taking into consideration its business features, the Group has identified and determined 22 issues covering greenhouse gas ("GHG") emission, energy consumption, employee welfare, occupational health and safety, training and development, supply chain management, customer privacy, anti-corruption, and community investment and other aspects with respect to business operation.

Materiality of ESG categories



### Environmental aspect

1. GHG emission
2. Energy consumption
3. Water consumption
4. Waste
5. Environmental impact of business
6. Use of natural resources and packaging materials
7. Customer engagement in environmental issues
8. Use of chemicals

### Social aspect

9. Local community engagement
10. Community investment
11. Occupational health and safety
12. Labour standards in supply chain
13. Training and development
14. Employee welfare
15. Inclusion and equal opportunities
16. Talent attraction and retention

### Operational aspect

17. Economic value generated
18. Corporate governance
19. Anti-corruption
20. Supply chain management
21. Customer satisfaction
22. Customer privacy

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## A. ENVIRONMENTAL

To fulfil its sustainability commitment and comply with the requirements under the laws and regulations in respect of environmental protection, the Group has been striving to reduce the impact of its operating activities on the environment.

### A1: Emissions

The Group strives to minimise the environmental impact of its mining activities, production activities and products. Gold mining and exploration properties ("**Taizhou Gold Mines**") are located in Tongguan County of Shaanxi Province, the gold mineralisation and production region in China. For the year ended 31 March 2021, the Group has complied with applicable environmental laws and regulations.

The business of the Group is governed under the Environmental Protection Law of the People's Republic of China (中華人民共和國環境保護法). Violation of relevant environmental regulations may result in temporary suspension of production.

The Group adheres to the principles of active participation and environmental responsibility. The Group not only performs its market duties, but also vigorously supports green activities and actively implements effective policies which are aimed at reducing emissions. The Group will consider purchasing more environmentally friendly machinery in case that the existing machinery is no longer available.

For the year ended 31 March 2021, the Group has no emissions of hazardous substances. No adverse comment or irregularity has been reported from internal and external control sources.

The Group has also adopted a set of CO<sub>2</sub> emission reduction management policy in order to save energy resources, reduce energy waste and improve energy efficiency. All the member companies of the Group strive to form energy saving habits. The emission reduction policy has stipulated certain guidelines, aiming to create better and cleaner environment for society.

Since the local legislation and standards for environmental protection are constantly updated, the Group shall assess whether these legislations and standards are relevant to the businesses of the Group and the Group's compliance status. During the year ended 31 March 2021, the Group has complied with environmental laws and regulations which were applicable to the Group's businesses. The Group will continue looking for ways to reduce CO<sub>2</sub> emission and land pollution.



## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

During the year ended 31 March 2021, pollution factors such as nitrogen oxide (“**NOx**”), sulfur oxide (“**SOx**”) and suspended particulate matters (“**PM**”, also known as “**Particles**”) were mainly generated from vehicles of the Company.

During the reporting period, air pollutant emissions were as follows:

Types of emission	Unit	2021	2020
Nitrogen oxide (NOx)	gramme	5,962	5,057 <sup>#</sup>
Sulfur oxide (SOx)	gramme	110	108 <sup>#</sup>
Suspended particulate matters (PM)	gramme	421	355

<sup>#</sup> Figures for 2020 have been restated to facilitate consistent comparisons.

The main sources of the Group’s GHG emissions are direct emission from the mobile combustion sources (“**Scope 1**”), indirect emission from acquired electricity emissions (“**Scope 2**”) and other indirect emissions (“**Scope 3**”).

For the year ended 31 March 2021, GHG emissions were as follows:

GHG Emissions	Unit	2021	2020
GHG emissions (Scope 1)	kg of carbon dioxide equivalent (“kgCO <sub>2</sub> e”)	22,195	34,166 <sup>#</sup>
GHG emissions (Scope 2)*	kgCO <sub>2</sub> e	7,279,913	7,806,834 <sup>#</sup>
GHG emissions (Scope 3)	kgCO <sub>2</sub> e	14,431	16,931 <sup>#</sup>
Total GHG emissions	kgCO <sub>2</sub> e	7,316,539	7,857,931
Total production	tonne	62,361	60,548
GHG intensity (total emissions/total production)	kgCO <sub>2</sub> e/tonne	117	130

\* The emissions related to electricity consumption were calculated on the basis of the emission factor of Northwest China Power Grid for 2019. Such figures have been calculated in accordance with the Reporting Guidance on Environmental KPIs.

<sup>#</sup> Figures for 2020 have been restated to facilitate consistent comparisons.

Scope 1: represents diesel and fuel oil consumed by motor vehicles.

Scope 2: represents electricity purchased from electricity suppliers.

Scope 3: represents scrap papers and water consumed.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### ***Waste micro dust management***

The Group blasts, stacks and loads and unloads ore during the production process which will produce micro dust. Therefore, the Group uses wet drilling method, ventilation machines and rock-surface cleaning regularly to control the micro dust emissions and avoid the adverse effect on the environment.

The micro dust may also be generated from the ore crushing and ore screening system. In order to control emissions of micro dust, the Group uses an automatic feeding system and wet ore brokering method to reduce the emissions of micro dust. The crushing and screening equipment is located in a fully enclosed workshop and ore storage yard is covered with a dense mesh as micro dust suppression methods.

### ***Wastewater management***

Wastewater (containing mainly suspended solid from ore processing) may be produced during the production process and thus the Group has built a wastewater treatment facility at the tailing pond to collect wastewater through dedicated pipelines of wastewater produced at the two ore processing plants. Following sedimentation at the wastewater treatment facility, the wastewater can reach the relevant discharge standards. However, to reduce substantially water consumption and thus improve resource conservation, the Group recycles and reuses all its treated wastewater back to its processing plants without any direct discharge to the environment, either from the processing plants or tailing pond under the normal operating conditions.

The Group also has one wastewater collection sump at each of its two operating processing plants for accidental discharges in case of any accident at the plants which may result in release of wastewater. In April 2020, according to the environmental protection requirements promulgated by local government, the Group has built a sedimentation tank with capacity of 100 M<sup>3</sup> at the pithead of wastewater collection sump. The proper collection, treatment and recycling and reuse of wastewater in the Group help protect natural receiving water bodies and ecological environment in the surrounding areas.

The Group has invested much production cost for wastewater control and recycling to meet the Integrated Wastewater Discharge Standards (污水綜合排放標準). The wastewater only contains a small amount of harmful substances and it is in line with Integrated Wastewater Discharge Standards.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### **Non-hazardous waste management**

The mine has been in continuous production for many years. Waste mining rocks are generated during the production process. The waste mining rock of the Group was used for road paving and underground filling of mines after being crushed. The remaining waste was stockpiled in special waste rock plants. Some of the mineral processing tailings were transported for underground filling of mines after being classified and disposed. The waste rock yard set up retaining walls as required to intercept drainage facilities to prevent soil erosion and mudslides.

The Group has not generated hazardous waste during its production process. The non-hazardous waste is mainly waste mining rock. The Group also transports domestic waste to designated garbage collection station.

For the year ended 31 March 2021, the quantity of hazardous and non-hazardous wastes generated were as follows:

Hazardous and non-hazardous wastes generated	Unit	2021	2020
Total quantity of hazardous wastes	tonne	N/A	N/A
Intensity of hazardous wastes	tonne	N/A	N/A
Total quantity of non-hazardous wastes	tonne	17,800	19,870
Intensity of non-hazardous wastes	tonne	0.29	0.33

### **Noise management**

The Group makes noise primarily when operating air pumps, blowers, ball mills, crushers, belts and vibratory screens during production. The Group controls noise by applying noise-abatement equipment, basic vibration reduction methods, vibration-absorptive and soundproofing rooms and rubber lining. The positions of these noise generation equipment are also in compliance with the applicable standards for buffer distances to sensitive receptors, such as residences and villages, and thus minimising the impacts.

The Group also makes noise in the process of blasting. The Group considered noise pollution issues when choosing the mining area, so the Group chose the mining area which is far away from the residential areas. The Group strictly follows Emission Standard for the Noise at the Boundaries of Industrial Enterprises (工業企業廠界噪聲標準).



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## *Compliance with relevant laws and regulations*

For the year ended 31 March 2021, the Group was not aware of air and GHG emissions, discharges into water source and land, or generated wastes which have a significant impact on the environment. The Group was not aware of any material violation of laws and regulations. The Group strictly complied with laws and regulations relating to emissions, such as the Environmental Protection Law of the People's Republic of China (中華人民共和國環境保護法), the Law on the Prevention and Control of Water Pollution of the People's Republic of China (中華人民共和國水污染防治法) and the Law on the Prevention and Control of Solid Waste Pollution of the People's Republic of China (中華人民共和國固體廢物環境防治法). Furthermore, no significant fine or nonmonetary sanction for non-compliance with relevant laws and regulations was imposed on the Group for the year ended 31 March 2021.

## **A2: Use of resources**

### ***Electricity, water and fossil fuel consumption***

The Group utilises resources effectively and initiatively takes its responsibilities to achieve sustainable development. The Group encourages its staff to develop environmentally responsible habits, control and reduce consumption, minimise waste and recycle useful materials.

The use of electricity, water and fossil fuel may have effect on the environment. When the Group conducts gold mining business or operates its offices, it exerts an impact on the environment through the consumption of electricity, water and fossil fuel. Nevertheless, the Group has always tried its best to reduce its energy consumption.

In October 2020, the Group reconstructed the high voltage lines in its mining area and replaced equipment and lines, in order to improve production capacity of the mining area and reduce its line loss.

The Group has no problem in accessing to appropriate water source. The existing supply of water source can satisfy the Group's needs in the aspects of volume and quality of water and guarantee of water supply facilities. For the year ended 31 March 2021, the Group has implemented measures on water conservation and consumption reduction and recycling of industrial waste water.

The Group used 245 tonnes (2020: 198 tonnes) explosive for mining gold mineral, and the production volume was 62,361 tonnes for the year ended 31 March 2021 (2020: 60,548 tonnes).

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The Group not only strictly observes the Energy Conservation Law of the People's Republic of China (中華人民共和國節約能源法), but also encourages its employees to develop resource saving and recycling habits in daily practices. To protect natural resources and increase operation efficiency, the Group closely monitors the use of resources with a view to ensuring full utilisation of resources and preventing wastage. Each department of the Group regularly reports on its use of resources and takes corrective actions for issues arisen in a timely manner.

The following consumption data was recorded for the year ended 31 March 2021 for gold mining business:

Environmental performance	Unit	2021	2020
Electricity consumption	KWh	8,160,608	8,750,589 <sup>#</sup>
Fuel consumption	KWh	363,560	426,605
Total energy consumption	KWh	8,524,168	9,177,194
Energy consumption intensity	KWh/per tonne of product	137	152
Water consumption	M <sup>3</sup>	17,544	19,754
Water consumption intensity	M <sup>3</sup> /per tonne of product	0.28	0.33
Total packaging material used	Kg	N/A	N/A
Intensity of packaging material used	Kg/tonne	N/A	N/A

<sup>#</sup> Figures for 2020 have been restated to facilitate consistent comparisons.

### A3: Environment and natural resources

#### *Measures to reduce environmental impact*

As gold mining operators, the Group inevitably needs to extract natural resources from Taizhou Gold Mines, thereby causing change to the ecological environment to a certain extent. The ecological impacts were mainly as a result of land occupation. The extent of the Group in extraction operation at Taizhou Gold Mines is performed in line with market demand and the Group has not engaged in any unnecessary exploitation and production activities. The Company complies with the policies under national laws and regulations, and the Group adopts standard production methods and technology. The Company has taken measures, such as water and soil conservation, mining area plantation, etc., to reduce the impact on the natural environment.

Efficiency and environmental protection are significant concerns and difficult long-term tasks for the Group and the society as a whole. The Group strictly monitors and reviews relevant data from time to time, so as to minimise the negative effect on the environment and, at the same time, maximise its business development and operation. In April 2020, the Group was awarded an Advanced Unit medal by the local government, in recognition of its effort on ecological environmental protection.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## B. SOCIAL

### B1: Employment

#### *Labour practices*

The Group has formulated good workplace practices for all the staff, regardless of their age, gender, race, colour, sexual orientation, disability or marital status, to prevent discrimination and promote equal opportunities and therefore increase job satisfaction among the employees. The Group endeavours to provide a good working environment for its employees because it regards every single staff member as a valuable asset of the Group.

The Group guarantees the rights and interests of employees relating to compensation and dismissal, recruitment and promotion, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfares. The Group clearly explains in detail the rights enjoyed by its employees with regard to their employment.

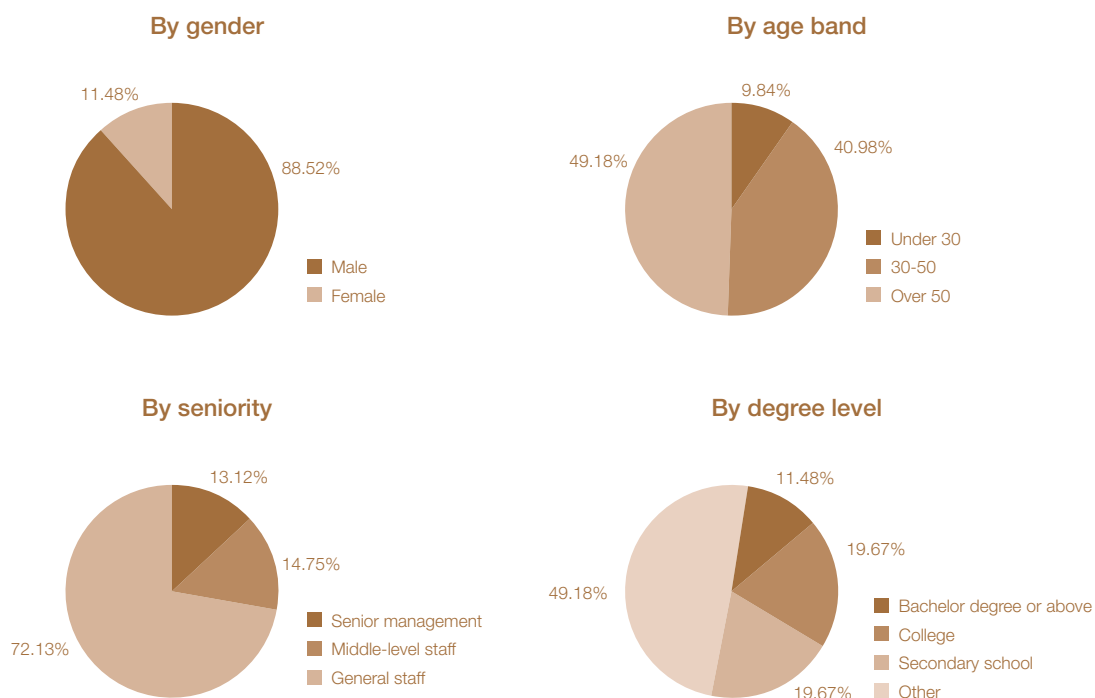
The Group carries out an annual review of employment policy to ensure the balance between employee remuneration and business growth, so that it can benefit the development of the Group.

#### *Anti-discrimination and equal opportunity*

The Group strives to diversify staff in terms of gender and age, so as to realise balance in culture and communication among staff. The Group is committed to providing a working environment free from discrimination and with equal opportunities for all its staff, regardless of age, gender, race, colour, sexual orientation, disability or marital status. The Group encourages labour diversity and welcomes labour from all areas, thus putting the principle of fairness into practice. The Group has not reported incidents of non-compliance with employment-related regulations during the year ended 31 March 2021.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The Group has implemented rigorous recruitment procedures to select and attract outstanding talents for the Group through a combination of external recruitment and internal training. For the year ended 31 March 2021, the proportions of employees (excluding independent non-executive directors) by gender, age band, seniority and degree level are as follows:



### *Compliance with relevant laws and regulations*

For the year ended 31 March 2021, the Group was not aware of any material non-compliance with the relevant laws and regulations relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare that have significant impact. The Group strictly complied with local laws and regulations relating to employment, such as the Labour Law of the People's Republic of China and the Labour Contract Law of the People's Republic of China, the Regulations on Enterprise Wage Payment of Shaanxi Province. In addition, there was no significant fine or sanction as a result of non-compliance with relevant laws and regulations as at 31 March 2021.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## B2: Health and Safety

### Workplace health and safety

It is critical for the Group to protect its employees' occupational health and safety. The Group respects occupational safety and health and other applicable regulations for a safe and comfortable working environment that protects employees from occupational hazards. For the year ended 31 March 2021, as the Group has been proactively improving workplace health and safety, the Group was awarded "Advanced Collective on Safety Production" by the local government which represented safety production.

The Group always treats employees' health and safety as its priority for production. Every worker is required to follow safety instructions and attend safety training on using equipment or plant. Safety monitoring mechanism has been established and staff has been assigned to monitor the compliance with safety rules at each production stage.

The Group has equipped its factory and head office with all the required safety equipment and facilities, and has passed all the governmental safety inspections.



Method of Risk Assessment for  
Operation Conditions in Mines



Procedures on Accident Prevention, Safety Risk  
Classification and the Screening, Identification and  
Control of Potential Hazards in Mines

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The Group uses explosives for mining gold and strictly follows rules and regulations on using explosives which are consistent with the standards in the PRC. There are dedicated, exclusive and isolated bunkers designed in accordance with the required standards and approved by safety authority and the local public security authority which controls the supplies. Detonators and explosives are stored in two separate bunkers with a safe distance to each other. The yard to these bunkers is secured with high walls, metal gate, and 24-hour video cameras. Both bunkers are well secured with two locks, with keys kept by two separate staff (one management personnel and one safety personnel). Only when both individuals (key keepers) are present at the same time, all the locks can be unlocked to access detonators and/or explosives. The storage facilities are regularly inspected by the management and the safety and public security authorities to ensure compliance at all time. After the use of explosives, the Group will use detection equipment to measure the residue in the air. Employees cannot be arranged to enter into the gold mine until the air meets the standards.



Safety facility outside explosive storage



Safety facility outside warehouse storing detonators



## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

During the outbreak of 2019 coronavirus disease (“COVID-19”), in light of various provisions promulgated by the Leadership Group of County Government for Fighting against COVID-19 Epidemic, the Group established its Leadership Group for Fighting against COVID-19 Epidemic. According to the prevention and control principle of “early precaution, early detection, early reporting, early isolation, and early treatment”, the Group strictly implemented its daily control measures. The Group also formulated the Proposal of Tongguan Taizhou Mining Company Limited\* (潼關縣太洲礦業有限責任公司) for Fighting against COVID-19 Epidemic and Resumption of Work and Production. The Group strictly adopted a number of precaution measures, including (i) personal health management; (ii) persistent cleaning of office areas, changing rooms and dining areas; (iii) all employees must wear a mask before entering office areas, changing rooms and dining areas; and (iv) all employees are required to have their body temperature checked before entering office areas, changing rooms and dining areas. In addition, the Group also adopted flexible working hours, and reduced unnecessary trips.



Temperature measurement for employees

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## *Compliance with relevant laws and regulations*

The Group follows the laws and regulations on ensuring workplace health and safety, which mainly include:

- Production Safety Law of the People's Republic of China
- Mine Safety Law of the People's Republic of China
- Emergency Response Law of the People's Republic of China
- Law of the People's Republic of China on the Prevention and Control of Occupational Diseases
- Special Equipment Safety Law of the People's Republic of China
- Safety Requirements on Explosive Hazardous Area

No significant fine or sanction for non-compliance with relevant laws and regulations was imposed on the Group for the year ended 31 March 2021. Moreover, the Group has maintained accident insurance for its employees. The Group has taken all reasonable measures to improve the working environment and to create a safe and comfortable workplace for employees. The management has improved the safety standard of workplace, and has provided mandatory training for all its staff.

## **B3: Development and Training**

### ***Employee development and training***

Continuous staff training plays a fundamental role in business growth. The Group encourages employees to engage in continuous development and to improve their skills through training. The Group understands that training is the most sustainable way for long-term development, which is beneficial for both the Group and its employees.

The Group provides training for its directors regarding the Group's development and essential skills, enabling them to have a better understanding of development potential of the Group and direction to enhance their management skills.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The Group provides various internal trainings for developing the workforce, including orientation and on-board trainings for new staff to enable them to adapt to the operation of the Group efficiently and strengthen their skills and knowledge required for work. It is important for employees to perform tasks safely, follow safety working procedures and operate machines and equipment cautiously.



Production safety training activities (Picture 1)



Emergency rescue course (Picture 2)



Emergency drill of chemical leakage (Picture 3)



Emergency drill of fire-fighting (Picture 4)

The Group evaluates the training programs from time to time and reviews the effectiveness of training. The Group makes effort to improve employees' knowledge and skills for discharging duties at work.

Moreover, the Group encourages mutual communication between management and employees. The Group respects and cares about employees' opinions and suggestions. Meanwhile, the Group releases the latest corporate news to all employees in a timely manner.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## B4: Labour Standards

### *Child labour and forced labour*

Any individual below legal working age and without any identification documents is unqualified for employment. It is the Group's policy to disqualify the person from employment if he/she is found to be hired against the requirements of the Labour Contract Law.

The Group makes good use of its Human Resource Department to ensure compliance with laws and regulations. The Human Resource Department takes the responsibilities to review and confirm employment practices to avoid child labour and forced labour. In case that any unlawful labour was identified, the Group would immediately assist relevant employee and cooperate with relevant labour authorities.

### *Compliance with relevant laws and regulations*

The Group followed the laws and regulations on prohibiting child labour and forced labour, which mainly include:

- Employment Ordinance of Hong Kong Special Administrative Region
- Labour Law of the People's Republic of China
- Labour Contract Law of the People's Republic of China
- Law of the People's Republic of China on Protection of Minors
- Regulations on Prohibiting Use of Child Labour (State Council Order No.364)

For the year ended 31 March 2021, there was no violation of laws and regulations on employment age or any labour dispute arose within the Group.

## B5: Supply Chain Management

### *Supplier management*

The Group aims to provide comprehensive solutions that meet customers' needs and establish a comprehensive vertical supply chain management system through resource integration and supplier screening and management.

The objectives of the Group are to deepen the collaborative relationship with its strategic suppliers and to create competitive advantages in the value chain, and thus to enhance the impact on the society and environment and to ensure that its suppliers uphold similar stance in sustainable development. The Group maintains long-term relationship with its suppliers to ensure stable supply.

During the year ended 31 March 2021, the Group purchases explosive substances from local reputable suppliers according to government regulations. The Group does not foresee its source of supplies would have effect on the operation of local factories.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### B6: Product Responsibility

#### *Product safety and quality*

The Group has formulated customary practices to ensure that its customers are well aware of the quality and gold content of mineral ore being purchased. A sample test would be conducted by an independent lab on each shipment of mineral ore under the supervision of representatives of the Group and its customer. The Group strives to provide its customers with quality products to establish good credibility and reputation. The Group has complied with relevant requirements in the Product Quality Law of the People's Republic of China.

The Group keeps business information and customers' data confidential in order to protect consumer data and privacy. The Group will destroy relevant information in due time.

#### *Compliance with relevant laws and regulations*

The directors believe that the Group has complied with relevant laws and regulations related to the products of the Group, such as the Product Quality Law of the People's Republic of China (中華人民共和國產品質量法). For the year ended 31 March 2021, the Group did not have any product returned due to safety or health problems or any complaint received from customers or any significant fine resulted from violation of regulations.

### B7: Anti-Corruption

#### *Anti-corruption and money laundering*

The Group's operation strictly complies with local and national legislations, such as the Prevention of Bribery Ordinance of Hong Kong and relevant legislation on anti-corruption of Mainland China.

The Group is well aware of the importance of honesty, integrity and fairness to its operation and has formulated its anti-corruption policy. The Group has reminded its employees at all levels many times of anti-corruption, giving and taking of interests in meetings and documents such as staff handbooks. Staff are required to declare any conflicts of interests when performing their duties.

Through the establishment of relevant rules and regulations, the Group encourages all the employees to discharge their duties with integrity and in compliance with the relevant laws and regulations. Transactions in monetary sums are processed through cash and bank transactions which require authorised signatures with appropriate levels. The Group didn't involve in money laundry and there was no enquiry or concern from the government or banking department.

For the year ended 31 March 2021, the Group did not record any bribery or corruption charge.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### *Compliance with relevant laws and regulations*

For the year ended 31 March 2021, neither the Group nor any of its employees was found involved in any legal proceedings relating to bribery, extortion, fraud or money laundering, or has recorded any bribery or corruption charge. The Group strictly complied with the Prevention of Bribery Ordinance, the Anti-unfair Competition Law of the People's Republic of China and other local laws and regulations relating to anti-corruption.

### **B8: Community Investment**

#### ***Community involvement***

Giving back to society is a component of the Group's sustainable development strategy. The Group fully supports community welfare and particularly focuses on underprivileged community to enhance its efficiency of community involvement. During the year, the Group carried out several social public welfare undertakings, including (i) donation of RMB100,000 to Tongguan Middle School of Tongguan County as student subsidies; (ii) donation of RMB35,000 to Oujiacheng Village of Taiyao Town of Tongguan County to alleviate poverty and help overcome poverty; (iii) donation of RMB30,000 to Zhongjunzhang Village of Chengguan Town of Tongguan County for constructing office of Village Committee; and (iv) donation of RMB20,000 to Gold Association of Tongguan County for holding art performance on celebrating the 70th Founding Anniversary of the Communist Party of China. In September 2020, the Group was also awarded a medal of Caring Enterprise on Donating and Supporting Education by local government for its contributions in donating and supporting education.

The Group fully understands and appreciates the importance of and the need for community investment. Through the daily contact with community officials and leaders, the Group explores the content and manner for the Group to engage in community. One remarkable move is that most employees working in the mining area were hired by the Group from the nearby villages, which was highly appreciated by the local community. The Group is committed to developing more community investment opportunities in its development plans.





**GRAND T G GOLD HOLDINGS LIMITED**  
**大唐潼金控股有限公司\***