



LEGENDARY GROUP LIMITED

創天傳承集團有限公司

(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 : 8195

2021

環境、社會及管治報告
Environmental, Social and
Governance Report



ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT FOR THE YEAR ENDED 31 MARCH 2021

截至二零二一年三月三十一日止年度的環境、社會及管治報告

INTRODUCTION AND SCOPE OF THE ESG REPORT

Legendary Group Limited (the “Company”), previously known as L & A International Holdings Limited, and its subsidiaries (the “Group”) are pleased to present the Environmental, Social and Governance (the “ESG”) report (“this ESG Report”) for the year ended 31 March 2021 (the “Reporting Year”) prepared in accordance to Appendix 20 Environmental, Social and Governance Reporting Guide (the “ESG Reporting Guide”) set out in the Rules Governing the Listing of Securities on GEM of the Stock Exchange of Hong Kong Limited (the “GEM Listing Rules”). This ESG Report intends to give insight into the approach adopted and actions taken by the Group regarding its operations and sustainability that have implication for the Group and the interest to stakeholders.

The Group understands the importance of sustainability development and is committed to making continuous improvements in performance of its ESG strategies in order to meet the changing needs of an advancing society and fulfil corporate social responsibilities. This ESG Report of the Group is prepared into two subject areas, environmental and social. Each subject area is included various aspects to disclose, including the relevant policies and the status of compliance with relevant laws and regulations as addressed by the ESG Reporting Guide. In addition, this ESG Report of the Group is presented general disclosure of required aspects in policies, initiatives and performance. The Group will continue to optimise and improve the disclosure requirements. The table below demonstrates the relationship between the ESG Reporting Guide and the issues found relevant to the Group:

環境、社會及管治報告簡介及範圍

創天傳承集團有限公司（「本公司」，前稱為樂亞國際控股有限公司）及其附屬公司（「本集團」）欣然呈列按照香港聯合交易所有限公司GEM證券上市規則（「GEM上市規則」）附錄二十所載環境、社會及管治報告指引（「環境、社會及管治報告指引」）所編製的截至二零二一年三月三十一日止年度（「報告年度」）的環境、社會及管治（「環境、社會及管治」）報告（「本環境、社會及管治報告」）。本環境、社會及管治報告旨在深入了解本集團在營運及可持續發展方面所採用的方法及行動，而該等方法及行動對本集團及持份者利益有所影響。

本集團知悉可持續發展的重要性，並致力持續改進其環境、社會及管治策略的表現，以求滿足社會日新月異的發展中不斷變化的需求及履行企業社會責任。本集團之本環境、社會及管治報告乃從環境及社會兩個主要範疇編製。各主要範疇披露多個層面，包括環境、社會及管治報告指引所述的相關政策及遵守相關法律法規的狀況。此外，本集團的環境、社會及管治報告主要呈列指定的一般披露政策、措施及表現。本集團將繼續優化及改善披露規定。下表闡釋環境、社會及管治報告指引與本集團有關事宜的關係：

ESG Reporting Guide

環境、社會及管治報告指引

A. Environmental
A. 環境

A.1 Emissions
A.1 排放物

Relevant ESG issues of the Group

本集團的相關環境、社會及管治事宜

Air emissions
空氣排放

Greenhouse gases emissions
溫室氣體排放

Waste management
廢物管理

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ESG Reporting Guide		Relevant ESG issues of the Group
環境、社會及管治報告指引		本集團的相關環境、社會及管治事宜
A.2	Use of resources	Energy and water consumption
A.2	資源使用	能源消耗及耗水量
		Paper usage
		用紙
		Packaging materials
		包裝物料
A.3	Environment and natural resources	Measures in reducing environmental impacts
A.3	環境及天然資源	減低對環境影響的措施
B.	Social	
B.	社會	
B.1	Employment	Labour practices
B.1	僱傭	勞工慣例
B.2	Health and safety	Workplace health and safety
B.2	健康與安全	工作環境健康與安全
B.3	Development and training	Employee development and training
B.3	發展及培訓	僱員發展及培訓
B.4	Labour standards	Child labour and forced labour
B.4	勞工準則	童工及強制勞工
B.5	Supply chain management	Supplier management
B.5	供應鏈管理	供應商管理
B.6	Product responsibility	Product safety and quality
B.6	產品責任	產品安全及質素
		Consumer data protection and privacy policies
		客戶數據保護及私隱政策

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ESG Reporting Guide

環境、社會及管治報告指引

Relevant ESG issues of the Group

本集團的相關環境、社會及管治事宜

B.7 Anti-corruption

B.7 反貪污

Anti-corruption

反貪污

Money laundering

洗錢

B.8 Community investment

B.8 社區投資

Community involvement

社區參與

ABOUT THE GROUP AND BUSINESS REPORTING BOUNDARY

A comprehensive assessment was conducted in order to evaluate the impacts of Group's operations on the environment and society during the development of the Group's ESG strategy. The Group is principally engaged in six business arms: (i) Original Equipment Manufacturer (the "OEM") business, which entails product design and development, raw materials sourcing and procurement, manufacturing and product quality control management; (ii) apparel retail business, which entails design designing, procuring, manufacturing, marketing and retailing of pure cashmere apparel and other apparel products as well as accessories through the retail network in Hong Kong under the Group's own brand and high-end fashion brand; (iii) money lending business, which provides financing to customers in Hong Kong; (iv) wholesaling business, which covers the wholesaling and distribution of seafood; (v) financial quotient and investment education business, which provides financial quotient and investment education courses for the customers, aiming at enhancing their knowledge in the areas of finance and investment; and (vi) property investment business, which seeks opportunities of asset appreciation and cash flow return in the property market within Hong Kong and in the Asia-Pacific region.

Unless otherwise indicated, the reporting boundaries of this ESG Report cover the significant business operations of the Group, including OEM business, financial quotient and investment education business as well as day-to-day administrative operations at office in Hong Kong. As compared to the same report for the financial year ended 31 March 2020, the reporting boundary was narrowed down the wholesaling business that is under suspension due to the COVID-19 pandemic (the "Pandemic"). The Group will regularly review the reporting boundaries and strive to enhance the transparency of the Group's ESG performance in the long run.

有關本集團及業務匯報範圍

於制訂本集團環境、社會及管治策略期間，我們已進行全面評估，以評估本集團營運對環境及社會的影響。本集團主要從事以下六個業務部門：(i)原設備製造（「原設備製造」）業務，承擔產品設計及開發、原材料採購、製造及產品質量控制管理；(ii)服裝零售業務，透過在本集團自有品牌及高檔時裝品牌旗下於香港的零售網絡承擔設計、採購、製造、市場推廣及零售純羊絨服裝以及其他服裝產品及配飾；(iii)放債業務，向香港客戶提供融資；(iv)批發業務，涵蓋批發及分銷海鮮；(v)財商及投資教育業務，為客戶提供財商及投資教育課程，旨在提升其於財務及投資領域的知識；及(vi)物業投資業務，於香港以至亞太地區的物業市場尋求資產增值及現金流回報機遇。

除非另有說明，本環境、社會及管治報告的匯報範圍涵蓋本集團的主要業務運營，包括原設備製造業務、財商及投資教育業務以及香港辦事處的日常工作。與截至二零二零年三月三十一日止財政年度的同一報告相比，匯報範圍因COVID-19疫情（「疫情」）而暫緩的批發業務而有所縮小。本集團將定期檢討報告範圍，並竭力提升本集團的長期環境、社會及管治表現的透明度。

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APPROACH AND STRATEGY

The board of directors has overall responsibility for:

- a) evaluating and determining the ESG-related risks of the Group; and
- b) overseeing the management in the design, implementation and monitoring of the risk management and internal control systems with a view to addressing the ESG-related issues.

The Group believes in delivering long-term sustainable value creation to the shareholders. In doing so, while the Group carries on its business, the management makes choices that bring positive impacts to the communities. The Group has adopted sustainability policies which cover in the areas of employment and labour practices, business integrity, the environment and the community. The Company is committed to supporting good environmental standards and to ensure implementation of environmental friendly measures.

方式及策略

董事會的整體責任為：

- a) 評估及確認本集團與環境、社會及管治相關的風險；及
- b) 監督管理層設計、執行及監察風險管理及內部監控系統，以處理與環境、社會及管治相關事宜。

本集團的信條為長期並可持續地為股東創造價值。為此，本集團於經營業務時，管理層作出會對社區帶來正面影響的決策。本集團已採納可持續政策，內容涵蓋僱傭及勞工慣例、業務誠信、環境及社區等領域。本公司致力支持良好環境準則，並確保實行環保措施。

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STAKEHOLDERS ENGAGEMENT

The Group recognises the expectation and feedback from their stakeholders are vital for sustainable development of the Group. An effective communication with key stakeholders is maintained to promote and adjust the strategy of sustainable development. Communication channels as well as interests and concerns of major stakeholder groups were as below:

持份者參與

本集團深明持份者的期望及回饋對本集團可持續發展至為重要。我們與主要持份者保持有效溝通，藉以推進及調整可持續發展策略。主要持份者群體的溝通渠道及利益訴求如下：

Stakeholders 持份者	Communication Channels 溝通渠道	Interests and Concerns 利益訴求
Employees 僱員	<ul style="list-style-type: none"> Meetings and communications 會議及通信 Training and workshops 培訓及研討會 Performance appraisal 績效考核 	<ul style="list-style-type: none"> Career development 職業發展 Remuneration and benefits 薪酬福利 Workplace health and safety 工作環境健康與安全
Shareholders and potential investors 股東及潛在投資者	<ul style="list-style-type: none"> Shareholders' meetings 股東大會 Financial reports 財務報告 Announcements and circulars 公佈及通函 Corporate website 企業網站 	<ul style="list-style-type: none"> Financial performance 財務業績 Corporate governance 企業管治 Sustainable operations 可持續經營
Customers 客戶	<ul style="list-style-type: none"> Hotline and email 熱線電話及電子郵件 In-person meetings 面對面會議 Corporate website 企業網站 	<ul style="list-style-type: none"> Products and services quality 產品及服務質素 Customer data and privacy protection 客戶數據及私隱保護

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Stakeholders 持份者	Communication Channels 溝通渠道	Interests and Concerns 利益訴求
Suppliers 供應商	<ul style="list-style-type: none"> Tendering and performance evaluation 招標及績效評估 Regular meetings and telecommunication 定期會議及通訊 	<ul style="list-style-type: none"> Sustainable cooperation 可持續合作 Fair and open selection process 公平公開的甄選程序 Payment schedule 付款計劃
Governmental regulators 政府監管部門	<ul style="list-style-type: none"> Compliance reporting 合規報告 Consultation papers 諮詢文件 Government cooperation 政府合作 	<ul style="list-style-type: none"> Operation in compliance with laws and regulations 遵守法律法規運營 Business integrity and ethics 商業誠信及道德
Communities 社區	<ul style="list-style-type: none"> Community activities 社區活動 Social media platforms 社交媒體平台 	<ul style="list-style-type: none"> Fulfilment of corporate social responsibility 履行社會企業責任

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MATERIALITY ASSESSMENT

Materiality assessment was conducted in accordance with the expectation and feedback from the key stakeholders. Based on the result of the materiality assessment, the management of the Group identified rights of employees, workplace health and safety, quality of products and services and protection of consumer data and privacy as key aspects of its long-term sustainability. Effective risk management and internal control systems on these aspects are reinforced with the aim of enhancing efficiency of operations and generating the environmental and social benefits to the stakeholders.

A. ENVIRONMENTAL

A1. Emissions

Due to the business nature of the Group, the operation of the Group no longer involves in the manufacturing activities and does not have material impacts on the environment and natural resources. No material amount of emission was generated during the Group's operations. Only a certain of greenhouse gases ("GHG") emissions and non-hazardous waste were produced from the use of resources during daily administration in Hong Kong office.

In spite of this, the Group is committed to minimising its environmental impacts by responsibly managing its business, reducing its carbon footprint and using resources effectively. Hence, the Group has implemented an "Environmental Facilities Operation and Management Policy" which covers the management of different emissions. The Group has also established relevant emissions reduction and energy saving initiatives to manage the emissions and maintain green operations.

重要性評估

重要性評估乃根據主要持份者的期望及回饋進行。根據重要性評估的結果，本集團管理層發現僱員權利、工作環境健康與安全、產品及服務質素以及客戶數據及私隱保護為長期可持續發展之主要方面。為提高營運效率及為持份者創造有利的環境及社會條件，本集團加強該等方面之有效風險管理及內部監控系統。

A. 環境

A1. 排放

由於本集團的業務性質，本集團的營運不再涉及製造活動，對環境及天然資源再無重大影響。本集團在運營期間並無產生任何大量的排放。僅在香港辦事處的日常行政工作中使用資源而產生一定數量的溫室氣體（「溫室氣體」）排放及非有害廢物。

儘管如此，本集團致力透過盡責管理其業務、減少其碳足印及有效運用資源以最大程度減低其環境影響。因此，本集團已推行「環保設施運行及管理政策」，有關政策涵蓋不同排放物之管理。本集團亦已制訂相關減排及節能措施以管理排放物及維持綠色營運。

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The Group is in strict compliance with relevant laws and regulations in Hong Kong, including the Air Pollution Control Ordinance, the Water Pollution Control Ordinance and the Waste Disposal Ordinance. During the Reporting Year, the Group was not aware of any non-compliance with relevant laws and regulations that had significant impact on the Group related to air and greenhouse gas emissions, discharges into water and land, generation of hazardous and non-hazardous waste.

Air emissions

Air pollutants, such as nitrogen oxides ("NOx"), sulphur oxides ("SOx") and particulate matter ("PM") are produced from the combustion of fuels while it is driving. The Group strives to minimise air pollutants emissions by ongoing monitoring and improvement on the usage of commercial vehicles. In view of the reduction in outdoor business and transportation activities due to the Pandemic, the Group disposed its motor vehicles during the Reporting Year. As a result, the Group did not generate a material amount of air pollutants emissions during the operations.

本集團嚴格遵守香港相關法律及法規，包括《空氣污染管制條例》、《水污染管制條例》及《廢物處置條例》。於報告年度，據本集團所知，並無任何因未遵守有關空氣及溫室氣體排放、向水及土地排污、產生有害及無害廢物之相關法律及法規而對本集團有重大影響之不合規情況。

空氣排放

於車輛行駛過程中燃燒燃料期間，會產生空氣污染物，例如氮氧化物（「氮氧化物」）、硫氧化物（「硫氧化物」）及懸浮粒子（「懸浮粒子」）。本集團不斷監察及改善商用車輛的使用情況，致力於減少空氣污染物的排放。鑒於戶外商業及運輸活動因疫情而減少，本集團已在報告年度內出售其車輛。因此，本集團在運營期間並無產生大量的空氣污染物排放。

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Greenhouse gases emissions

The emission of carbon dioxide ("CO₂") has been calculated based on the amount of energy consumed multiple by the emission factors and the emission of CO₂ (in kg). The emissions of CO₂ are broadly classified into three scopes:

Scope 1 – Direct emissions from combustion of fuels;

Scope 2 – Energy indirect emissions; and

Scope 3 – Other indirect emissions.

The Group mainly generates GHG emission through the use of electricity within Scope 2 and the production of paper waste within Scope 3 during daily administration in the offices. Apart from electricity consumption, combustion of fuels and business travelling also led to the direct and indirect emissions of greenhouse gas under Scope 1 and Scope 3 respectively.

溫室氣體排放

二氧化碳（「二氧化碳」）的排放乃根據消耗的能量乘以排放因素及二氧化碳排放（以公斤計）計算所得。二氧化碳排放大致分為三個範圍：

範圍1 – 燃燒燃料導致的直接排放；

範圍2 – 能量間接排放；及

範圍3 – 其他間接排放。

本集團主要通過使用電力在範圍2內及於辦公室日常行政營運中在範圍3內產生廢紙而導致溫室氣體排放。除電力消耗外，燃料燃燒及商務差旅亦分別導致範圍1和範圍3項下的直接及間接溫室氣體排放。

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During the Reporting Year, total GHG emissions was approximately 4,452 kg of CO₂ (2020: 74,728 kg). Electricity used in the business premises is the major contributor to greenhouse gas footprint. The emission of CO₂ for the year ended 31 March 2020 and 2021 is summarised as follow:

於報告年度，總溫室氣體排放約為4,452公斤二氧化碳（二零二零年：74,728公斤）。商業場所使用的電力是導致溫室氣體的主要因素。於截至二零二零年及二零二一年三月三十一日止年度的二氧化碳排放概述如下：

Source of CO ₂ emissions	Year	Quantity consumed	CO ₂ equivalent emissions	CO ₂ emission Intensity
二氧化碳排放來源	年份	消耗量	二氧化碳排放當量 (kg) (公斤)	二氧化碳排放密度 (Unit per staff) (單位／每員工)
Scope 1				
範圍1				
Motor vehicle – Unleaded petroleum	2021	Nil	Nil	Nil
車輛 – 無鉛汽油	二零二一年	零	零	零
	2020	4,198 L	9,908	550
	二零二零年	4,198公升	9,908	550
Scope 2				
範圍2				
Electricity consumption	2021	11,680 kWh	4,322	617
電力消耗	二零二一年	11,680千瓦時	4,322	617
	2020	131,074 kWh	64,226	3,568
	二零二零年	131,074千瓦時	64,226	3,568
Scope 3				
範圍3				
Paper consumption	2021	25 kg	120	17
紙張耗用	二零二一年	25公斤	120	17
	2020	100 kg	480	27
	二零二零年	100公斤	480	27
Business travel	2021	89 km	10	2
商務差旅	二零二一年	89公里	10	2
	2020	1,039 km	114	6
	二零二零年	1,039公里	114	6
Total CO₂ emissions	2021	–	4,452	636
總二氧化碳排放	二零二一年	–	4,452	636
	2020	–	74,728	4,151
	二零二零年	–	74,728	4,151

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Direct GHG emission within Scope 1 was not generated because all motor vehicles were disposed and relevant unleaded petroleum was no longer consumed during the Report Year.

The significant decrease in GHG emissions under scope 2 and scope 3 during the Reporting Year was mainly due to the suspension of wholesaling business, implementation of work-from-home arrangement for administration, the contraction of business activities and reduction of business travelling under the Pandemic.

Since the Group was establishing mechanism for analysis of ESG data within financial quotient and investment education business which was newly established during the year ended 31 March 2020, the use of resources and relevant emissions in this business was excluded on this ESG report.

The Group endeavours to improve energy efficiency and reduce energy consumption by adopting energy saving initiatives mentioned in the Section "Use of Resources" of this Report.

Waste management

The Group's operations do not produce any hazardous waste such as chemical wastes, clinical wastes and hazardous chemicals. The non-hazardous waste produced by the Group is mainly paper waste. Measures for reducing and recycling the paper waste are put in place and mentioned in the Sections "Paper Usage" and "Packing Materials" of this ESG Report.

範圍1內的直接溫室氣體排放並未產生，乃由於在報告年度內，所有車輛均已處置，亦不再消耗相關無鉛汽油。

於報告年度，範圍2及範圍3項下溫室氣體排放量大幅下降乃主要由於疫情下批發業務暫停、實行居家辦公行政安排、業務活動收縮及商務出行減少所致。

由於本集團於截至二零二零年三月三十一日止年度新設立的財商及投資教育業務正在建立環境、社會及管治數據分析機制，因此本環境、社會及管治報告不包括該業務中的資源使用及相關排放。

本集團致力透過採納本報告「資源使用」一節所載的節能計劃，改善能源效益及減少能源消耗。

廢物管理

本集團的營運不會產生任何有害廢物，例如化學廢料、醫療廢物及有害化學品。本集團所產生的非有害廢物主要為廢紙。本集團已制訂減少及回收廢紙的措施，詳見本環境、社會及管治報告「用紙」及「包裝物料」章節。

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A2. Use of Resources

The Group places a great emphasis on environmental protection to ensure efficient use of energy and resources. With the implementation of the Group's "Energy and Resources Policy", the Group strives to reduce the resources consumption by implementing energy, water and papers efficiency initiatives and encouraging its employees, customers, business partners and the community to adopt environmentally responsible behaviour.

Energy and water consumption

The energy consumption of the Group mainly comes from purchased electricity. In view of the scarcity of energy, the Group has advocated various energy conservation strategies. The Group has adopted energy-saving lighting systems and equipment to reduce the energy usage during operations. In order to avoid unnecessary energy consumption, air-conditioners and other equipment are used according to the seasonal adjustment and lightings are switched off when the room is not in used.

Under the impacts of the Pandemic, the Group coordinated financial quotient and investment education courses online to maintain the continuity of its business activities. The transformation from face-to-face classroom model to online and electronic model has not only enhanced efficiency in education, but also improved the efficiency in the use of energy and resources.

Water is another important resource used by the Group in daily operations. The Group mainly consumes water for cleaning purpose in the office premises. The water supply and discharge are controlled by the building's management office and those data are not available to the Group. Despite the water usage of the Group is not significant and it has no issues with sourcing water, the Group endeavours to conserve water effectively by identifying water saving initiatives. Used water is re-used under feasible circumstances. Furthermore, the Group has conducted regular maintenance of water pipes to prevent leakage of water and repair any defective components.

A2. 資源使用

本集團十分重視環境保護，以確保有效使用能源及資源。本集團實行「能源及資源政策」後，致力透過推行能源、用水及用紙效益措施以及鼓勵其僱員、客戶、業務夥伴及社區採取對環境負責任之行為，減少資源消耗。

能源消耗及耗水量

本集團之能源消耗主要來自所購電力。鑒於能源稀缺，本集團倡議推行多項節能策略。本集團已採用節能照明系統及設備以減少營運中的能源使用。為避免不必要的能源消耗，空調及其他設備乃根據季節性調整使用，而照明設備於房間無人使用時關閉。

受疫情影響，本集團透過以線上形式舉辦財商及投資教育課程，保持業務活動的連續性。從面對面的課堂模式向在線及電子模式的轉變，不僅提高了教學效率，亦提高了能源及資源的使用效率。

水為本集團日常營運中使用的另一項重要資源。本集團主要於辦公場所消耗用水作清潔用途。供水及排水由物業管理處控制，本集團無法獲得該等數據。儘管本集團的用水量並不大且在取水方面沒有問題，本集團致力透過識別節水措施以有效節省用水。廢水會在可行情況下再次利用。此外，本集團對水管進行常規保養以避免漏水，並會修理任何缺損部分。

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The Group's total resources consumption and consumption intensity are listed below:

本集團的總資源消耗及消耗密度呈列如下：

Resources 資源	Unit 單位	Year 年份	Energy consumption 能源消耗	Consumption intensity 消耗密度 (Unit per staff) (單位／每員工)
Electricity 電力	kWh 千瓦時	2021 二零二一年	11,680 kWh 11,680 千瓦時	1,669 kWh 1,669 千瓦時
		2020 二零二零年	131,074 kWh 131,074 千瓦時	7,282 kWh 7,282 千瓦時
Unleaded petroleum 無鉛汽油	Litre 公升	2021 二零二一年	Nil 零	Nil 零
		2020 二零二零年	4,198 L 4,198 公升	233 L 233 公升

The reason of decrement in electricity and unleaded petroleum consumption has been explained in Section "Air emissions" and "Greenhouse gases emissions".

電力消耗量及無鉛汽油消耗量下降之原因已於「空氣排放」及「溫室氣體排放」章節作出解釋。

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Paper usage

The Group has established a host of paper-saving initiatives to reuse and recycle paper. This is an opportunity to enhance environmental benefits by undertaking such conservative actions. Papers have been recycled by promoting double-sided printing and by promoting the use of telecommunication and electronic media. During the Reporting Year, the Group strengthens the promotion of paperless and electronic business operation and avoiding paper documents and hard copies, the effective implementation of above measures achieved a satisfactory result, the paper usage reduced significantly.

As one of the main source of paper usage, financial quotient and investment education business has being distributed the electronic teaching materials to students online to avoid hard copies. The Group will continuous to promote electronic teaching to minimise the environmental impact of paper consumption within the education business.

Packaging materials

To reduce wastage in packaging materials, the Group minimises the use of packaging materials. Carton boxes and plastic wrapping are reused if possible. During the Reporting Year, the Group considers the use of packaging material are immaterial. Further, the Group promotes the message of "Bring Your Own Bag (BYOB)" and does not provide any bags to customers.

A3. Environment and natural resources

Measures in reducing environmental impacts

Due to the nature of the business, the Group does not have any direct and significant impacts on the environment and natural resources in the course of its operations. With the integration of policies and measures to reduce emissions and resources consumption, the Group strives to reduce the impacts on the environment and natural resources.

用紙

本集團已制訂多項節約用紙措施，以重用及循環再用紙張，此乃透過落實推行環保工作以為環境增益的良機。本集團鼓勵回收紙張作雙面打印，亦提倡採用電子通訊及電子媒體。於報告年度，本集團加強推進無紙化及電子化業務營運，避免使用紙質文件及列印本，上述措施的有效實施取得了令人滿意的成果，紙張用量大幅減少。

作為紙張使用的主要來源之一，財商及投資教育業務為避免使用列印本，已將電子教材在線分發予學生。本集團將繼續推廣電子教學，以盡量減少教育業務中紙張消耗對環境的影響。

包裝物料

為減少包裝物料造成的浪費，本集團盡量減少使用包裝物料，並盡可能重用瓦通紙箱及塑膠包裝。本集團認為，其於報告年度使用之包裝物料數量極少。再者，本集團推廣「自攜購物袋」理念，不會向客戶提供任何購物袋。

A3. 環境及天然資源

減少環境影響的措施

基於業務性質，本集團在其日常營運中並無對環境及天然資源造成任何直接及重大影響。藉著整合有關降低排放及資源消耗的政策及措施，本集團致力減低對環境及天然資源的影響。

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B. SOCIAL

B1. Employment

Labour practices

The Group believes people are valuable assets and their diligent efforts and continuous supports are crucial to the Group's development and success. As such, the Group aims to attract and retain talents, provide a safe and equal working environment for its employees and promote employee health and well-being. The Group is in strict compliance with relevant laws and regulations in Hong Kong, including the Employment Ordinance, the Sex Discrimination Ordinance, the Disability Discrimination Ordinance, the Family Status Discrimination Ordinance, and the Race Ordinance.

The Group's "Human Resources Management Policy" covers the Group's standard in respect of compensation and dismissal, recruitment and promotion, working hours, rest periods and other benefits and welfare. In addition, the Group is dedicated to providing equal opportunity in all aspects of employment and maintaining a workplace that is free from discrimination or harassment against any individual on the basis of seniority, nationality, gender, age, marital status, disability, race, color, religion or sexual preference. All employees are recruited based on their skills and experience. They are appraised based on the same standards of work performance.

During the Reporting Year, the Group was not aware of any non-compliance with the relevant laws and regulations that had significant impact on the Group relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare.

B. 社會

B1. 僱傭

勞工慣例

本集團認為員工乃寶貴資產，而彼等之辛勤努力及不懈支持對本集團之發展及成功至為重要。故此，本集團致力吸引及挽留人才，為其僱員提供安全及平等的工作環境以及促進僱員健康及福祉。本集團嚴格遵守香港相關法律及法規，包括《僱傭條例》、《性別歧視條例》、《殘疾歧視條例》、《家庭崗位歧視條例》及《種族歧視條例》。

本集團之「人力資源管理政策」涵蓋本集團有關補償及解僱、招聘及晉升、工時、休息期間及其他福利之準則。此外，本集團致力在僱傭所有方面提供公平機會，並維持一個任何人士均不會因年資、國籍、性別、年齡、婚姻狀況、殘疾、種族、膚色、宗教或性傾向而受到歧視或騷擾之工作環境。所有僱員乃根據其技能及經驗招聘。彼等按照相同的工作表現標準進行評核。

於報告年度，據本集團所知，並無任何因違反有關補償及解僱、招聘及晉升、工時、休息期間、公平機會、多元化、反歧視及其他福利的相關法律及法規而對本集團有重大影響之不合規情況。

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As at 31 March 2021, the Group was employing 7 staff (2020: 18) in Hong Kong, the overall male/female ratio is approximately 2.5:1 (2020: 1.57:1).

During the Reporting Year, the turnover rate of the Group was about 30% (2020: 58%). The Group has a diverse workforce in terms of distribution of gender, age and region.

All employees have participated in the Mandatory Provident Fund Scheme Ordinance (Chapter 485 of the Laws of Hong Kong). Staff are remunerated according to the job nature, market trends and individual performance.

B2. Health and Safety

Workplace health and safety

The Group places the highest priority on securing the health and safety of its employees. The Group complies with the Occupational Safety and Health Ordinance to maintain a healthy and safe workplace for its employees and protect them from work-related injuries. As stipulated in the Group's "Health, Safety and Environment Policy Statement", the Group strives to reduce and control the health, safety and environment related risks. The Group continues to monitor the effectiveness of safety-related controls and conduct assessments on its health and safety performance. The monitoring includes regular safety inspection of equipment. In order to create a corporate culture of health and safety, the Group conveys to its employees the importance of occupational health and safety to enhance their awareness.

於二零二一年三月三十一日，本集團於香港有7名員工（二零二零年：18名），而整體男／女比例約為2.5:1（二零二零年：1.57:1）。

於報告年度，本集團的流失率約為30%（二零二零年：58%）。本集團員工隊伍由不同性別、年齡及地區的人士組成。

所有僱員已參與《強制性公積金條例》（香港法例第485章）。員工乃根據工作性質、市場趨勢及個人表現以薪酬犒勞。

B2. 健康與安全

工作環境健康與安全

本集團以確保僱員的健康與安全為首要任務。本集團遵守《職業安全及健康條例》，以為其僱員維持健康與安全的工作環境，並保護僱員免受工傷。誠如本集團之「健康、安全及環境政策聲明」所規定，本集團致力降低及控制健康、安全與環境相關的風險。本集團持續監察與安全相關之控制措施之效力，並就其健康與安全表現進行評估。監察包括常規的設備安全檢查。為建立健康與安全的企業文化，本集團向其僱員灌輸職業健康與安全的重要性，以提高其相關意識。

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The outbreak of novel coronavirus in January 2020 has been posed a significant threat to public health. The Group exercised social responsibility to safeguard its employees against infection and contain the epidemic by implemented a series of measures:

- Reminded the employees to maintain good personal hygiene such as the need to wear surgical masks properly and washing hands frequently in office;
- Requested the employees to declare their health and recent travelling history;
- Requested the employees who had been to travelled overseas recently to stay at home for self-quarantine; and
- Adopted flexible working arrangement to allow employees to work from home so as to enhance social distancing.

The Group will closely monitor the development of the epidemic and strengthen the precautionary measures if necessary.

During the Reporting Year, there was no case of work-related fatality and injury. The Group was not aware of any non-compliance with relevant laws and regulations that had significant impact on the Group in providing a safe and healthy working environment during the Reporting Year.

於二零二零年一月，新型冠狀病毒疫情的爆發對公共衛生構成重大威脅。本集團採取一系列措施履行社會責任，以保護其僱員免受感染並控制疫情：

- 提醒僱員保持良好的個人衛生習慣，如在辦公室內正確佩戴外科口罩及勤洗手；
- 要求僱員申報彼等的健康狀況及近期旅行記錄；
- 要求近期曾出國旅行的僱員留在家中進行自我檢疫隔離；及
- 採用靈活的工作安排以允許僱員在家辦公，加強並保持社交距離。

本集團將密切監察疫情的發展，並在必要時加強預防措施。

於報告年度，並無因工傷亡個案。據本集團所知，於報告年度並無任何有關提供安全及健康工作環境之相關法律及法規而對本集團有重大影響的不合規情況。

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B3: Development and training

Employee development and training

The Group considers the skills and knowledge of its employees as the key elements of sustainable development of the Group. Hence, the Group provides training opportunities for its employees to enhance their working capabilities and management competence according to the Group's "Human Resources Management Policy". The on-the-job trainings offered are based on the business needs, needs of respective positions and interests of employees. Employees are also provided with the opportunities to participate in trainings offered by professional training institutions or experts.

The Group acknowledges that the knowledge and skills of the lecturing teams in financial quotient and investment education business is a critical factor to success for educational services provider. Hence, the Group encourages its lecturing teams' members to participate in professional training courses and continuous education to ensure the continual standards of high-quality services to the students.

Directors and senior management of the Group participate in training so as to maintain their continuous professional development and to fulfill their obligations under the GEM Listing Rules.

B3：發展及培訓

僱員發展及培訓

本集團視其僱員之技能及知識為本集團可持續發展之關鍵元素。因此，根據本集團之「人力資源管理政策」，本集團為旗下僱員提供培訓機會，以提升其工作能力及管理能力。在職培訓乃根據業務需要、相關職位之需要及僱員利益而提供。僱員亦獲提供機會參與專業培訓機構或專家提供之培訓。

本集團認為財商及投資教育業務的講師團隊的知識和技能乃教育服務提供者的成功關鍵因素。因此，本集團鼓勵其講師團隊成員參加專業培訓課程及持續教育，以確保為學生提供持續的優質服務。

本集團董事及高級管理層參與培訓，以維持彼等的持續專業發展及履行GEM上市規則規定之義務。

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B4. Labour Standards

Child labour and forced labour

The Group is committed to upholding the elimination of all forms of forced labour and supporting the effective abolition of child labour. The Group strictly prohibits the use of child labour in accordance with the Employment of Children Regulations. As prevention of engaging child labour, job applicants are required to present identity proofs during recruitment process according to the Group's "Human Resources Management Policy".

In addition, the Group respects the freedom of employees and has established a "Prohibition of Forced Labour Policy", covering regulations to prohibit and prevent forced labour. Employees have the rights to report any case of infringement of their rights to the management.

During the Reporting Year, the Group was not aware of any non-compliance with relevant laws and regulations related to recruitment of child labour or forced labour practices.

B4. 勞工準則

童工及強制勞工

本集團致力消除一切形式的強制勞工，並支持有效廢除童工。根據《僱用兒童規例》，本集團嚴禁聘用童工。為避免聘用童工，求職者於招聘過程中須根據本集團之「人力資源管理政策」出示身份證明文件。

此外，本集團尊重僱員之自由，並制訂「禁止強制勞工政策」，涵蓋禁止及避免強制勞工之規例。僱員有權向管理層報告其權利受到侵犯之任何個案。

於報告年度，據本集團所知，並無任何有關聘用童工或強制勞工之相關法律及法規之不合規情況。

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B5. Supply Chain Management

Supplier management

The Group aims not to be directly or indirectly involved in corrupt practices or complicit in human rights abuses. Hence, the Group requires its supply chain partners to uphold the Group's principles of ethical business conduct. Besides, the Group gives preference to collaborate with suppliers who work towards responsible and sustainable operation. Through managing and engaging with its supply chain, the Group strives to create positive impacts on the environment and society.

The Group believes that its procurement can ultimately affect its product and service quality. As such, the Group has adopted a "Suppliers Social Responsibilities Control Procedure" to manage and mitigate the environmental and social risks in the supply chain. The Group selects suppliers carefully and evaluates their performance continuously through regular site visits. Quality of their products/services, and efficiency of deliveries are considered in the selection and evaluation. In case of non-compliance discovered, the cooperation will be terminated to uphold the Group's standards.

B5. 供應鏈管理

供應商管理

本集團的宗旨為不直接或間接牽涉貪污行為或合謀侵犯人權。因此，本集團要求其供應鏈合作夥伴秉承本集團的商業道德操守原則。此外，本集團優先與以負責任及可持續經營為工作方針之供應商合作。本集團致力透過管理其供應鏈及與其供應商溝通，為環境及社會帶來正面影響。

本集團相信其採購程序可最終影響產品及服務質素。故此，本集團已採納「供應商社會責任控制程序」，以管理及減輕供應鏈中的環境及社會風險。本集團審慎挑選供應商，並通過定期的實地視察持續評估其表現。在挑選及評估過程中會考慮彼等產品／服務的質素及運送效率。倘發現不合規情況，合作將會終止，以維持本集團之標準。

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B6. Product Responsibility

Product safety and quality

The Group has dedicated to putting the products and services quality as its first priority as the performance of the products and services would affect the long-term relationship with customers and the reputation and success of the business. In OEM business, the Group performs inspection on products before delivery to ensure the products have met the quality standards and implemented the outgoing quality control. To improve the quality of services in financial quotient and investment education business, the Group continuous to provide training and development to its employees to familiarise with up-to-dated knowledge in financial and investment industries.

The Group understands that customer satisfaction is correlated to quality of its product and services. Various complaint and enquiry channels, such as customer hotline, email etc., are offered for customers to express their needs and opinion of using products and/or receiving services. The Group will handle all the complaints seriously to allow the continuous improvement on the overall quality of the products and services. The Group would refund or pay compensation for damage caused by the products due to defects. During the Reporting Year, the Group did not receive any complaint regarding the quality of the product/service and there was no product/service subject to recall for safety or health reasons. The Group was not aware of any non-compliance with relevant laws and regulations regarding product responsibility.

B6. 產品責任

產品安全及質素

由於產品及服務表現會影響與客戶的長遠關係以及本集團之聲譽及業務成功發展，故本集團秉持產品及服務質素第一的信念。於原設備製造業務方面，本集團於交貨前對產品進行檢驗，以確保產品符合質量標準並實施出廠質量控制。為提升財商及投資教育業務的服務質素，本集團不斷為其僱員提供培訓及發展，以熟悉金融及投資行業的最新知識。

本集團深知客戶滿意度與其產品及服務的質量息息相關。本集團提供多種投訴查詢渠道，如客戶熱線、電子郵件等，以供客戶表述彼等對使用產品及／或接受服務的需求及意見。本集團將嚴肅處理所有投訴，使產品及服務的整體質素不斷提高。本集團會就產品因缺損而導致的損害作出退款或支付賠償。於報告年度，本集團並無接獲任何有關產品／服務質素的投訴，而且並無產品／服務因安全或健康原因而須回收。據本集團所知，並無任何有關產品責任的相關法律及法規之不合規情況。

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Consumer data protection and privacy policies

The Group has developed a policy of information management system to guide staff on control and usage of company data and to restrict access or use where necessary to protect the interests of the Group. Data is classified into different levels according to the confidentiality as public, internal, and restricted/confidential. Only senior management is authorised to access restricted/confidential data. In order to protect consumer data and privacy, the Group will keep the client information together and destroy on a timely basis. During the Reporting Year, the Group did not notice any occurrence of data leakage.

B7. Anti-Corruption

Anti-corruption

The Group is committed to upholding the highest standards of business ethics in its business and operations. The Group is in strict compliance with the Prevention of Bribery Ordinance and has zero tolerance on any forms of bribery, corruption and fraud. With the implementation of "Anti-corruption and Anti-Fraud Management System", the Group conveys to its employees the Group's requirements towards anti-corruption.

The Group has established communication channels, including phone and email, for employees to report on observed and suspected case of non-compliance and questionable practices. After receipt of the case, the Group will perform anti-corruption investigation. Once a misconduct case is confirmed, it will be reported to relevant legal authorities and relevant personnel will be subject to disciplinary actions.

During the Reporting Year, the Group was not aware of any non-compliance with the relevant laws and regulations that had significant impact on the Group relating to bribery, extortion, fraud and money laundering.

客戶數據保護及私隱政策

本集團已就資訊管理系統制訂政策，為員工提供控制及使用本公司數據的指引，並於有需要時限制存取或使用數據以保障本集團利益。數據按其保密程度分為公開、內部及限制／保密級別。只有高級管理層獲授權取得限制／保密數據。為保障客戶數據及私隱，本集團將數據集中儲存及適時銷毀客戶資料。於報告年度，本集團未有發現任何數據洩漏事件。

B7. 反貪污

反貪污

本集團致力在其業務及經營中建立最高標準之商業道德規範。本集團嚴格遵守《防止賄賂條例》，絕不容忍任何形式之賄賂、貪污及舞弊。實行「反貪污及反舞弊管理制度」後，本集團向其僱員傳達本集團對就反貪污所作之規定。

本集團已設立溝通渠道（包括電話及電郵），供僱員報告所見及疑似之不合規個案及有問題之行為。於接獲個案後，本集團將進行反貪污調查。一旦確認存在不當行為個案，將向相關法定機構報告，而相關人員將面臨紀律行動。

於報告年度，據本集團所知，並無任何有關賄賂、敲詐、舞弊及洗錢之相關法律及法規而對本集團有重大影響的不合規情況。

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Money laundering

As a money lending service provider in Hong Kong, the Group is committed to preventing and detecting money laundering and terrorist financing. The Group strictly follows the Money Lenders Ordinance and Guideline on Compliance of Anti-Money Laundering and Counter-Terrorist Financing Requirements for Licensed Money Lenders. In addition, the Group has incorporated and implemented those guidelines into the operation and policies and procedures for prevention and detection of money laundering and terrorist financing, which include the followings:

- Procedures for customer due diligence – before accepting customers' loan application, the Group carries out Know-Your-Customer procedures to verify customers' identity with reference to reliable and independent source of documents, such as documents from government and/or public authorities. The Group inspects the Hong Kong Identify Card and proof of residential address for individual customers; and inspects the Certificate of Incorporation and/or Business Registration Certificate for corporate customers. The Group also performs land registry and/or similar checking to verify the ownership of the collaterals;
- Reporting suspicious transactions – the employees of the Group should report to the top management as soon as possible when suspicious transactions were identified. The Group will then promptly report the suspicious transactions to Joint Financial Intelligence Unit using the standard form or the e-channel of Suspicious Transaction Report and Management System ("STREAMS");
- Personal data and record keeping – all essential information of customers is properly maintained in accordance with Personal Data (Privacy) Ordinance;

洗錢

作為香港的放債服務供應商，本集團致力防止及偵測洗錢及恐怖分子融資。本集團嚴格遵守《放債人條例》及持牌放債人遵從打擊洗錢及恐怖分子資金籌集規定的指引。此外，本集團已將該等指導方針納入並實施到防止及偵測洗錢及恐怖分子融資的操作、政策及程序中，其中包括以下內容：

- 客戶盡職審查程序 – 在接受客戶的貸款申請前，本集團會使用可靠及獨立的原始文件（例如政府及／或公共機關的文件）核實客戶的身份來執行「認識客戶」程序。本集團檢查香港身份證及居住地址證明（適用於個人客戶）；及檢查公司註冊證書及／或商業登記證書（適用於企業客戶）。本集團亦會進行土地登記查冊及／或類似檢查以核實抵押物的擁有權；
- 報告可疑交易 – 當發現可疑交易時，本集團僱員應盡快向最高管理層報告。本集團隨後將使用可疑交易報告及管理系統（「可疑交易報告及管理系統」）的標準表格或電子渠道及時向聯合財富情報組報告可疑交易；
- 個人資料及記錄保存 – 所有必要的客戶資料按照《個人資料（私隱）條例》妥善存置；

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- Loan repayment monitoring – the Group requires all drawdowns and repayments of loans are only made by cheque and/or bank transfer with customers' bank accounts to enhance the transparency of the money flow; and
- Staff training – the Group provides continuous training and development to its employees to update the knowledge in relation to money lending business and relevant legislation and practices in compliance with relevant rules and regulations of anti-money laundering and terrorist financing.
- 貸款還款監控 – 本集團要求所有貸款的提款及還款只透過支票及／或經客戶銀行戶口進行銀行轉賬，使提高資金流動的透明度；及
- 員工培訓 – 本集團向其僱員提供持續培訓及發展，以更新有關放債業務及相關法例及慣例的知識，並遵守反洗錢及恐怖分子融資的相關規則及規例。

B8. Community investment Community involvement

The Group is constantly aware of the needs of community and take up its corporate responsibility to contribute to the society. The Group has formulated a "Community Investment Policy" and aims to focus on the living standards of community, culture projects, education and development and labour cooperation. The Group also strives to develop long-term relationships with its key stakeholders and bring a positive impact on community development. In addition, the Group encourages its staff to actively participate in charitable activities and volunteer works, especially on those related to environmental protection. During the Reporting Year, the Group was awarded with the title of "Caring Company" by the Hong Kong Council of Social Services in recognition of its contributions to the community.

B8. 社區投資 社區參與

本集團一直明瞭社區之需要，並履行本身的企業責任，為社會作出貢獻。本集團已制訂「社區投資政策」，旨在專注於社區生活水平、文化項目、教育及發展以及勞工合作。本集團亦致力與其主要持份者發展長期關係及為社區發展帶來正面影響。此外，本集團鼓勵員工積極參與公益活動及義務工作，尤其是與環境保護相關者。於報告年度，本集團獲香港社會服務聯會授予「商界展關懷」稱號，以表揚其對社會的貢獻。

LEGENDARY GROUP LIMITED
創天傳承集團有限公司