

# K W Nelson

Interior Design and Contracting Group Limited  
(Incorporated in the Cayman Islands with limited liability)

Stock Code: 8411

Environmental, Social and  
Governance Report 2021

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# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2021

## SCOPE AND REPORTING PERIOD

This is the sixth Environmental, Social, and Governance (ESG) report of the K W Nelson Interior Design and Contracting Group Limited (hereafter the “Group”), highlighting its ESG performance, with disclosure reference made to the ESG Reporting Guide as described in Appendix 20 of the Rules Governing the Listing of Securities on GEM of the Stock Exchange of Hong Kong Limited (the “GEM Listing Rules”) and Guidance set out by The Stock Exchange of Hong Kong Limited.

The Group is an interior decorator based in Hong Kong, focusing on providing interior designs and coordinating interior decoration projects primarily for commercial premises including offices, medical centres, retail shops, warehouse, restaurants and shopping malls mainly located in Hong Kong. The Group provides interior design proposals developed by its designers and engages subcontractors to carry out fitting-out works which are coordinated, managed and supervised by the Group’s project managers. The Group also undertakes decoration projects in which it is only responsible for project management and fitting-out works. This ESG report covers the Group’s overall performance in two subject areas, namely, Environmental and Social of its key operations stated below in Hong Kong from 1 January 2021 to 31 December 2021 (the “Reporting Period”), unless otherwise stated.

- the operation in Hong Kong of the headquarter of K W Nelson Interior Design and Contracting Group Limited incorporated in the Cayman Islands with limited liability; and
- the operation in Hong Kong of K W Nelson Interior Design and Contracting Limited incorporated in Hong Kong with limited liability (a major subsidiary of the Company).

## THE GROUP’S SUSTAINABILITY MISSION AND VISION

The Group incorporates ESG approaches into its daily management to achieve the optimum balance between economic performance, environmental protection, social responsibility, and stakeholder satisfaction.

The Group has formulated several short to medium term strategic goals: (i) establishing an international team and expanding the Hong Kong office, and optimising the Group’s equipment and facilities; (ii) focusing on high-quality projects to strengthen the Group’s market position in Hong Kong and China; (iii) increasing the Group’s influence and identifying more business opportunities; and (iv) expanding the Group’s business in mainland China.

The Group considers employees as its most valuable asset and sustains its capability in interior design by investing in design and technical talents. These will enhance the service quality provided to its customers, and help the Group keep a keen market sensitivity toward the latest practices in the industry. The Group believes that by continuously investing in people and the environment, the financial outcome will be enhanced, and synergies will be formed, ultimately achieving sustainable development for the Group and all stakeholders.

## GOVERNANCE STRUCTURE

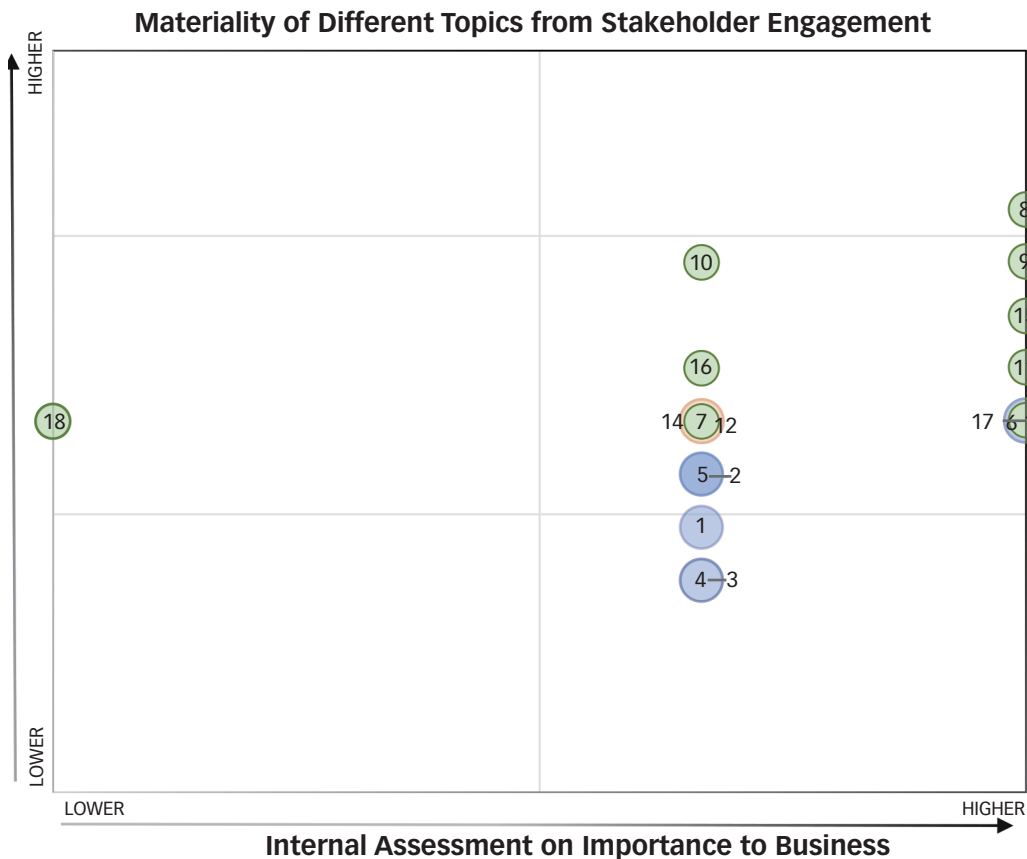
The board of directors of the Company (the “Board”) acknowledges that it has overall responsibility for the Group’s ESG strategy and reporting and for evaluating and determining the Group’s ESG-related risks. Its ESG performance is supervised by the board members. Relevant risks and opportunities have been embedded into the Group’s strategic goals, which are also closely aligned with the overall mission and vision on sustainability. On the basis of confirmation provided by the management of the Group and through on-going discussions with the management, management has confirmed to the Board, and the Board believes that the Group has in place appropriate and effective ESG risk management and internal control systems.

The Group has complied with all the “comply or explain” provisions set out in the ESG Reporting Guide during the Reporting Period.

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## STAKEHOLDER ENGAGEMENT AND MATERIALITY

In order to identify the most significant ESG aspects, the Group conducted quantitative surveys to understand the concerns and interests of its internal and external stakeholders. The issues identified have been plotted in the materiality matrix below, showing the importance of issues to its stakeholders against the impact to the business.



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Environmental		Social	
1	Energy	8	Employment
2	Water	9	Occupational Health and Safety
3	Air Emission	10	Development and Training
4	Waste and Effluent	11	Labour Standards
5	Other Raw Materials Consumption	12	Supplier Management
6	Environmental Protection Measures	13	Intellectual Property
7	Climate Change	14	Data Protection
		15	Customer Service
		16	Product/Service Quality
		17	Anti-corruption
		18	Community Investment

Among the environmental and social aspects, the following topics are identified as the most material issues to the stakeholders:

- Employment
- Occupational Health and Safety
- Customer Service
- Labour Standards
- Climate Change

The Group will continue to identify areas of improvement and deploy resources to manage the concerned areas.

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### STAKEHOLDER COMMUNICATION CHANNELS

The Group engages with key stakeholders such as board members, managers, supervisors, frontline workers, suppliers, and customers to understand their needs and concerns. Besides the annual stakeholder survey, the Group communicates with stakeholders via various communication channels such as written memos, regular meetings, and interviews.

Stakeholders	Possible Issue of Concern	Communication Channels
<b>Investors</b>	<ul style="list-style-type: none"> <li>• Return on investment</li> <li>• Financial performance</li> </ul>	<ul style="list-style-type: none"> <li>• Annual general meeting</li> <li>• Financial reports</li> <li>• Corporate website</li> <li>• Announcements, notices of meetings, circulars</li> </ul>
<b>Clients</b>	<ul style="list-style-type: none"> <li>• Robust project management</li> <li>• Full compliance with regulations</li> <li>• High quality products and services</li> <li>• Protect customers' right</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate websites</li> <li>• Regular meetings and communication</li> <li>• Customer satisfaction survey</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>• Compensation and benefits</li> <li>• Occupational health and safety</li> <li>• Career development and opportunities</li> <li>• Corporate culture and well-being</li> <li>• Employee's compensation and benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Provide leisure activities and increase cohesion</li> <li>• In-house training programmes</li> <li>• Performance reviews and appraisals</li> <li>• Means for employee to express opinions (e.g. opinion form and suggestion box)</li> <li>• Regular meeting and management communication (e.g. email and telephone)</li> </ul>
<b>Sub-contractors</b>	<ul style="list-style-type: none"> <li>• Effective project management</li> <li>• Occupational health and safety</li> <li>• Ethical business practices</li> <li>• Sub-contractors assessment criteria</li> </ul>	<ul style="list-style-type: none"> <li>• Annual health, safety and environment seminars</li> <li>• Regular progress meetings</li> <li>• Audits and assessments</li> </ul>
<b>Government</b>	<ul style="list-style-type: none"> <li>• Laws and regulatory compliance</li> <li>• Proper tax payment</li> </ul>	<ul style="list-style-type: none"> <li>• On-site inspections</li> <li>• Work reports preparation and submission for approval</li> <li>• Financial reports</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>• Long-term partnership</li> <li>• Sustainable supply chain</li> <li>• Fair and open tendering</li> </ul>	<ul style="list-style-type: none"> <li>• Procurement processes</li> <li>• Audits and assessments</li> <li>• Supplier management meetings and events</li> </ul>

The Group endeavours to actively listen to and collaborate with its stakeholders to ensure that their opinions can be voiced out through proper communication channels. In the long run, the stakeholders' contribution will aid the Group in improving the performance of potentially overlooked ESG topics and ensure the continued success of the Group's business in the competitive market.

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## STAKEHOLDERS' FEEDBACK

The Group welcomes stakeholders' feedback on our ESG approach and performance. Please give your suggestions or share your views with us via email at [info@kwnelson.com.hk](mailto:info@kwnelson.com.hk).

### A. ENVIRONMENTAL

The Group is committed to complying with laws and regulations regarding environmental protection. It adopts effective measures to achieve resource efficiency, energy saving, and waste reduction. To reduce its impacts on the environment, the Group implements green office practices such as re-deploying office furniture as far as possible, encouraging the use of recycled paper for printing and copying, double-sided printing and copying, and reducing energy consumption by switching off idling lights, air conditioners, and other electrical appliances.

The Group strictly complies with applicable laws and regulations concerning environmental protection and pollution control, such as the Environmental Impact Assessment Ordinance and Waste Disposal Ordinance.

No material non-compliance with relevant laws and regulations relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste had been identified during the Reporting Period.

#### A1. Emissions

##### A1.1 Air Emissions

The office did not generate direct air emissions. The Group's operations mainly focus on providing interior design and decoration services, and do not involve gaseous fuel consumption. Therefore, no material emissions of air pollutants were identified during the Reporting Period. Fitting-out works carried out by sub-contractors may generate certain indoor air pollutants. Meanwhile, the Group has deployed project managers at the site to supervise sub-contractors' work.

Passenger cars consuming gasoline were used for daily business operations. Their combustion generated several air emissions including nitrogen oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>), and respiratory suspended particles (PM). The Group has a total amount of 0.05 kg SO<sub>x</sub> during the Reporting Period.

##### A1.2 Greenhouse Gas (GHG) Emissions

Emissions from the Group were generated directly from the consumption of mobile fuel (i.e. gasoline for the Group-owned vehicles), and indirectly from the consumption of purchased electricity, processing of fresh water and sewage, land filling of waste papers, and business air travel.

There were 29.46 tonnes, with an intensity of 0.7 kg per HK\$1,000 revenue, of carbon dioxide equivalent (tCO<sub>2e</sub>) GHG emitted from the Group's operation during the Reporting Period.

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The Group has set a target of reducing GHG emission by 5% by the year 2030.

The reported GHG emissions were attributed to the following activities:

- Direct emission (scope 1): combustion of gasoline for the Group-owned vehicles;
- Indirect emission (scope 2): purchased electricity;
- Other indirect emission (scope 3): processing of freshwater and sewage, business air travel and waste disposal.

Scope of GHG emissions	Emission sources	GHG Emission (in tCO <sub>2e</sub> )	Sub-total (in tCO <sub>2e</sub> )	Total GHG emission (in percentage)
Scope 1 Direct emission <sup>1</sup>	Combustion of gasoline in mobile sources	9.29	9.29	32%
Scope 2 Energy indirect emission <sup>2</sup>	Purchased electricity	17.07	17.07	58%
Scope 3 Other indirect emission	Paper waste disposed at landfills	1.55	3.1	11%
	Electricity used for processing fresh water	0.02		
	Electricity used for processing sewage	0.01		
	Business air travel by employees <sup>3</sup>	1.52		
Total (in tCO <sub>2e</sub> )		29.46		100%
Intensity (kg CO <sub>2e</sub> /HK\$1,000 revenue)		0.7		

*Note 1:* Emission factors were referred to Appendix 20 of the GEM Listing Rules and their referred documentation as set out by Hong Kong Exchanges and Clearing Limited, unless stated otherwise.

*Note 2:* Emission factor of 0.71 tCO<sub>2e</sub>/kWh was used for purchased electricity from Hong Kong Electric ("HKE").

*Note 3:* Emissions were calculated using the online tool provided by the International Civil Aviation Organization.

### A1.3 Hazardous Waste

The business operations of the Group produce no hazardous waste such as chemical wastes. Thus, no data was recorded during the Reporting Period, and no policy has been formulated.



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### A1.4 Non-hazardous Waste

During the Reporting Period, the Group complied with the Waste Disposal Ordinance. Two major categories of non-hazardous waste were generated, namely (i) office waste; and (ii) construction and demolition (“C&D”) waste from fitting-out works. It generated a total of 1,721 tonnes of non-hazardous waste during the Reporting Period, with an intensity of 40.98kg per HK\$1,000 revenue.

Office waste mainly included waste papers. During the Reporting Period, the Group purchased 322kg of paper for design and office work. It was assumed that all purchased paper was consumed and eventually disposed at landfills.

C&D waste from fitting-out works consist of gypsum board, wooden board, ceiling grid, carpet and other decoration debris, which would be disposed and managed by sub-contractors. The amount of C&D waste produced was computed based on the cost of demolition for the project. For every HK\$1,000 demolition cost, it was assumed that 1 tonne of waste were produced. It was estimated that 1,721 tonnes of C&D waste from fitting out works was generated. Sub-contractors are responsible for sending the C&D waste to the designated landfills for construction waste. The Group’s project managers monitor the process to ensure that the sub-contractors do not engage in illicit waste disposal.

Non-hazardous waste	Waste treatment method	Annual waste amount (in tonnes)
C&D waste from fitting-out works	Treated by sub-contractors	1,721
General office waste (i. e. wastepaper)	Collected by the building custodian for further municipal waste treatment	0.32
Total		1,721.32
Intensity (kg waste/HK\$1,000 revenue)		41

### A1.5 Measures to Mitigate Emissions

To reduce emissions from vehicles, employees are encouraged to take public transport wherever possible. The Group schedules and arranges the route of its vehicles to avoid unnecessary travel and/or congestion. When new vehicles need to be purchased, the first consideration is the vehicle’s fuel consumption. To reduce its emissions relating to business travel, the Group avoids non-essential business travel and encourages employees to take low-carbon travelling methods wherever possible.

### A1.6 Wastes Reduction and Initiatives

The Group has developed a Green Office Practice to encourage the wise use of resources while promoting waste reduction at source. The Group promotes a paperless office — documents and information are transmitted electronically to avoid paper consumption. When printing is inevitable, paper should be printed on both sides whenever possible. The Group also encourages employees to recycle paper, plastic bottles and tin cans; and has recycled equipment such as computers and communication devices according to the Producer Responsibility Scheme on Waste Electrical and Electronic Equipment.

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No formal policy on waste reduction has been established to regulate its sub-contractors. Nevertheless, they are encouraged to reduce waste and reuse resources to minimise environmental impacts.

With decreasing availability of suitable land for landfill and increasing environmental impacts of waste disposal, waste reduction has always been one of the objectives of the Group. The Group has set a target of reducing waste by 5% by the year 2030.

### A2. Use of Resources

#### A2.1 Energy Consumption

The Group consumed electricity and gasoline as energy sources. The total consumption was 57,888 Kilowatt-hour ("kWh"). The overall intensity of energy consumption for the Group was 1.38 kWh per HK\$1,000 revenue. The energy consumption had increased significantly by 160.4% when compared to the previous reporting period.

Energy source	Direct consumption	Consumption in kWh unit
Electricity	24,048 kWh	24,048
Gasoline	3,492 litres	33,840
Total		57,888
Intensity (kWh/HK\$1,000 revenue)		1.38

Note: Conversion factors were referred to IEA Energy Statistics Manual and 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

#### A2.2 Water Consumption

The Group's business operation did not generate a significant amount of industrial wastewater. The Group mainly operates in leased office premises and the total water consumption of the Group was 52m<sup>3</sup>, with an intensity of 0.0012m<sup>3</sup> per HK\$1,000 revenue. Since the water supply is centrally managed and sourced from governmental bodies, there was no water sourcing issue during the Reporting Period.

#### A2.3 Energy Use Efficiency Initiatives

The Group has emphasised the essentialness of energy conservation and believes that reducing energy use could be mutually beneficial to the environment and the Group by reducing the operating costs and creating long-term value to its stakeholders. The Group encourages employees to switch off electrical appliances whenever not in use and all unnecessary lighting, air conditioners, and electrical appliances before they leave the office.

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### **A2.4 Water Use Efficiency Initiatives**

The Group consumed insignificant amount of water resources. No policies nor initiatives have been formulated. Yet, employees are reminded to save water and reduce wastage.

No formal policy on energy or water use efficiency has been established for its sub-contractors. Nevertheless, they are reminded to save water and energy.

### **A2.5 Packaging Material**

The Group's business operation did not involve a significant use of packaging materials.

### **A2.6 Noise Pollution**

The Group's fitting-out works may cause noise nuisance to the surrounding neighbourhood. In order to ensure that noise levels at the project sites are in line with the statutory requirement prescribed in relevant regulations, the Group carries out the works under non-restricted hours to minimise the effect of emanated noise or vibration from its works towards the surroundings.

## **A3. The Environment and Natural Resources**

To reduce the impact of renovation activities, designers and marketing managers of the Group provide eco-friendly materials options for its customers to choose from.

### **A3.1 Significant Impacts of Activities on the Environment**

Indirect environmental impacts of the Group are mitigated by promoting pro-environmental behaviours among its employees. The Group will continuously monitor its air emissions and solid waste generation to minimise its impacts on the environment.

## **A4. Climate Change**

It's been recently reported that the building and construction industry makes up about 40 percent of the world's carbon emissions, but interiors have largely been thought to make up only a small part of that percentage.

However, a 2020 report has suggested that over the course of an average building's life span, the carbon footprint of its interiors may equal if not exceed that of the structure's construction.

The Group are keenly aware that renovating interiors has a major impact on the environment. To help reduce the impact on the environment, the Group offers customers more environmentally friendly products and services wherever possible.

As awareness of environmental pollution grows amongst society, the Group constantly engages with its customers and suppliers to develop more environmentally friendly interiors, from the initial design concept right through the selection of suitable materials and incorporating the latest technology to reduce the impact on the environment.

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## B. SOCIAL

### 1. Employment and labour practices

The Group stringently complies with national and local laws and regulations concerning employment and labour practices, including but not limited to the Employment Ordinance, the General Holiday Ordinance, the Disability Discrimination Ordinance, and the Race Discrimination Ordinance.

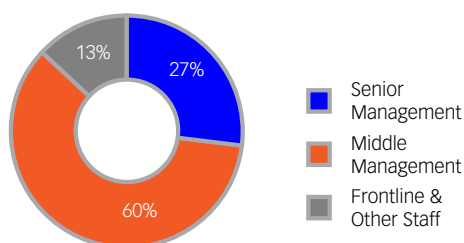
During the Reporting Period, no non-compliance with relevant laws and regulations that have a significant impact on the Group relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare had been identified.

#### B1. Employment

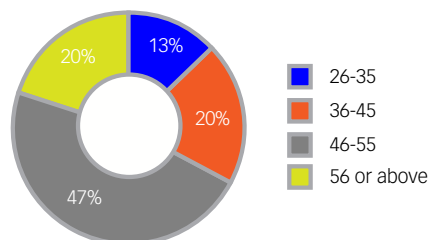
##### Workforce

The Group had a total number of 15 employees as of 31 December 2021. The total workforce categorised by employee category, age group, gender, and geographical region are shown below.

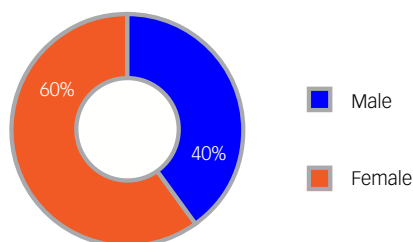
**Employee Category**



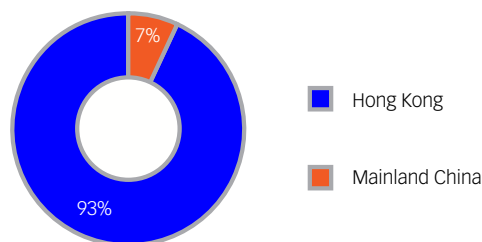
**Age Group**



**Gender**



**Geographical Region**



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### *Turnover*

During the Reporting Period, 5 employees left the Group, representing a 33% turnover rate. The details of staff turnover is shown in the table below:

Staff type		Total number of staff left during the Reporting Period
By gender	Male	2
	Female	3
By age group	18-25	0
	26-35	1
	46-55	4
	56 or above	0
By category	Senior management	0
	Middle management	3
	Frontline & Other staff	2
By geographical region	Hong Kong	5
	China	0

### *Remuneration and welfare*

The Group continues to provide a competitive salary for employees, including basic salary, incentive bonus, mandatory provident fund, and other fringe benefits. Year-end bonus may be awarded based on employees' and the Group's performance. Performance appraisal is conducted regularly to evaluate employees' performance regarding working attitude, technical skills, interpersonal skills. With reference to the appraisal, promotion and salary increment are rewarded to the contributing staff. The Group also refers to the market average salary level to adjust employees' salary. Employee may also be granted share awards under the share award scheme adopted by the Company.

The employment policies and guidelines outline the remuneration and promotion policy, compensation and dismissal policy, annual/paid/sick/compassionate leave policies, working attendance policy, appraisal, rewards and penalties, development and training, and occupational health and safety.

The Group ensures that all employees are entitled to benefits and welfare upon successful completion of probation. Working hours were maintained at the same level as that of the last Reporting Period. All employees are entitled to 12 days of annual leave, in addition to 17 days of public holidays per annum.

### *Dismissal*

The termination of a labour contract includes different types and categories, such as resignation, dismissal, and termination under various situations. Either party may terminate the employment upon giving the other side one month's notice in writing or the payment of one month's salary.

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### *Equal Opportunity*

The recruitment procedure, appraisal, promotion, and rewarding and penalty system are outlined in the Employee Handbook. The Group has specifically formulated the “fair opportunities for promotion” rule, in which all employees can be promoted based on their performance.

A harmonious and inclusive work environment, free from any harassment and discrimination is promoted in the Group. The Group is committed to providing equal opportunities throughout employment, including the remuneration, recruitment, training and promotion of staff. It is committed to ensuring that no employee receives less favourable treatment or is unlawfully discriminated against on the grounds of ethnic background, nationality, religion, colour, age, gender, sexual orientation, marital status, family status, national origin, citizenship, disability, pregnancy or any other characteristics protected by law.

### *Employee Relations*

The Group believes that strong communication is a prerequisite for effective management. To enhance communication among employees, activities such as team lunches, birthday parties and bonding sessions were held regularly. Employees are also encouraged to give feedback and suggestions to the Group for improvements to be made.

### **B2. Employee Health and Safety**

The Group strictly follows relevant laws and regulations such as the Occupational Safety and Health Ordinance. There was no material non-compliance with the applicable laws and regulations relating to occupational health and safety which had a material impact on the Group.

The Group’s project managers have been trained and awarded with a Certificate for Safety & Health Supervisors (Construction) issued by the government. They are responsible for coordinating, managing and supervising the fitting out works carried out by the sub-contractors, and ensuring that they observe laws and regulations relating to health and safety.

The Group understands that preventive measures are much more important than reactive measures. Therefore, sufficient first-aid boxes have been equipped in the office area in case of any emergencies. During the Reporting Period, there was no case of work injury or fatalities reported in the Group. Looking ahead, the Group would continue to promote occupational health and safety to its employees and avoid any work injury or accident by all means.

To prevent ergonomic hazards due to prolonged use of computers, the Group has provided employees with desks of suitable height and height adjustable chairs, and encourages them to pay attention to their usual sitting posture, take breaks and do stretching exercises regularly to reduce occupational strain. Employees are also reminded to take safety precautions and use suitable tools for assistance when lifting heavy goods or reaching items at height.

During the Reporting Period, no fatalities, work-related injury cases or lost days due to work injury was recorded in the Group. The Group was not in violation of any of the relevant laws and regulations in relation to providing a safe working environment and protecting the employees from occupational hazards that have a significant impact on the Group during the Reporting Period.

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## *COVID-19*

During the pandemic period, employees are required to wear face masks for prevention. The Group has purchased sufficient cleaners and disinfectants for maintaining personal and workplace hygiene. Employees who have symptoms or live in a residential building with confirmed cases of COVID-19 are required to conduct a COVID-19 nucleic acid test and work from home until they have received a negative test result.

### **B3. Development and Training**

The Group values employee training and considers it as an important means to improve the Group's overall operational efficiency. The Group focuses on the ability requirements of each level of employee to ensure that employees are growing with the Group at the same time. It regularly identifies and assesses the training needs of its employees by collecting and analysing the feedback from employees through systematic evaluation.

### **B4. Labour Standards**

As a conscience employer, the Group prohibits any form of discrimination and forced labour. We will take all practicable steps to prevent having illegal immigrants from being on site and prevent illegal workers who are not lawfully employable from taking employment on site.

The Group strictly complies with relevant laws and regulations such as Employment Ordinance and the Disability Discrimination Ordinance of the Laws of Hong Kong. Background checks are conducted on all new employees to ensure that no teenagers under the statutory minimum working age are employed. Any violence, with the purpose of deliberately causing difficulties, threats and/or corporal punishment forcing employees to work is prohibited. Should any child or forced labour be discovered, the Group will conduct an investigation and the concerned person will be dismissed permanently. All employees must provide their personal identity documents to prove their age and identity. During the Reporting Period, to the best of Directors' knowledge, the Group was not aware of any significant non-compliance case relating to child labour and forced labour.

## **2. Operating Practices**

### **B5. Supply Chain Management**

Supplier management is an important element of the Group's quality control. The Group implements a strict supplier and contractor selection process to ensure that they deliver high quality products and services. The Group requests suppliers, contractors, and other business partners to implement adequate management policies regarding their social and environmental impacts. Regular meetings and discussions were held with sub-contractors to assure their compliance with relevant laws and regulations in Hong Kong, such as those identified under the Environmental and Social section. The Group conducts regular inspections and assessments to ensure that sub-contractors comply with the environmental and social code of conduct and that they have implemented safety management rules as required by the Occupation Safety and Health Ordinance (Cap.509).

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During procurement, the project managers are responsible for selecting suppliers and reviewing the performance of their products and services. More environmentally friendly products or services should be procured whenever feasible, with a view to minimising negative impacts to the environment and human health, and conserving natural resources. All suppliers are evaluated according to not only conformance to all applicable statutory and regulatory requirements, but also on their environmental credentials. If a supplier is deemed to be in non-performance of its social and environmental obligations, it will be asked to rectify the failure as soon as is practical. If non-conformance continues, the supplier will be removed from the supply chain.

### **B6. Product Responsibility**

#### *Product Labelling, Health and Safety, and Advertising*

Product labelling, health and safety, and advertising were not applicable due to the business nature of the Group. The purchased building materials, such as gypsum board, wood board, and ceiling grid, were environmentally friendly materials that meet European Union standards. The Group's project managers supervise on-site fitting-out work to ensure work procedures follow the Occupational Safety and Health Ordinance and generate minimum health and safety impacts on the fitting-out workers and the surrounding community.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to health and safety, advertising, labeling and privacy matters relating to products and services provided had been identified during the Reporting Period.

#### *Quality Assurance*

The Group's project managers supervise on-site projects to guarantee that the fitting-out works are of identical quality to what was agreed. When the project managers find any work not conforming to the operating procedures, they will follow up immediately.

#### *Data Protection*

The Group acknowledges the importance of protecting privacy and confidentiality of relevant stakeholders and prohibits the use of any personal information of clients by other parties. The Group implements various schemes to prevent misuse or abuse of customer sensitive information, and data leakage. The Group follows the Personal Data (Privacy) Ordinance to handle all personal information. Employees must strictly comply with anti-virus protection regulations. To protect confidential information (e. g. business strategies and methods, technical specifications, intellectual property, data of customers and business partners, and any information which the Group may be subject to confidentiality or non-disclosure obligations), privacy and interests of K W Nelson and its stakeholder, employees shall:

- use confidential information solely for the advancement of the business of the Group and not for personal benefit or that of any other person or entity;
- always maintain and protect the strictest confidentiality in respect of all confidential information and in any circumstances, except when required by law or by the order of the court and only to such extent as required or ordered;



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- not approach or contact any existing customers of the Group for the purposes of soliciting business from such customers; and
- not remove or transmit any confidential information, whether in original form or in duplication or reproduction, from the premises of the Group by electronic or any other means without the prior written consent of the Group.

### *Intellectual Property*

The Group extensively invests in innovation and introduces innovative designs and services to various customers. Correspondingly, the Group pays great attention to protect its intellectual property ("IP") rights. The IP clauses set out in Labour Contract continues to guide the protection of IP rights and business confidentiality of the Group and its business partners. All employees shall protect the Group's IP rights including, but not limited to all concepts, ideas, plans, drafts, sketches, designs, drawings, layouts, images, charts, models, artworks, development or improvement, and any other intellectual achievements whether or not copyrighted, or any other intellectual property rights subsist or are capable of subsisting in respect of the same.

### **B7. Anti-corruption**

The Group requires employees and business partners to behave ethically. All parties shall conform to the Prevention of Bribery Ordinance, and all relevant laws, regulations and regulatory documents relating to commercial bribery.

No employees shall offer nor accept any gifts without consent from the Group. Employees discovering any suspected cases of corruption, bribery, blackmail, fraud and money laundering incidents must report it to the administration department.

The Group has a whistleblowing policy that encourage and assist whistle-blowers to disclose information relevant to suspected misconduct, malpractice or irregularity through a confidential reporting channel. All complaints filed are confidential and the Group is responsible for protecting the legitimate rights and interests of the whistle blower.

In the event of bribery, extortion, fraud and money laundering, the Group will investigate in depth and report to the Hong Kong Independent Commission Against Corruption (ICAC) if necessary. The Group has not aided, abetted, assisted or colluded with an individual who has committed, or conspired to commit any unlawful activities.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to corruption, bribery, fraud and money laundering had been identified during the Reporting Period.

### **B8. Community Investment**

The Group strives to implement corporate social responsibility and actively participates in public welfare activities. No formal policy on community investment has been established. Nevertheless, during the Reporting Period, the Group has actively encouraged its employees to participate in various charitable events, such as the Hong Kong Marathon and The Community Chest "Walk for Millions" 2021/2022.

# K W Nelson

Interior Design and Contracting Group Limited  
(Incorporated in the Cayman Islands with limited liability)

Stock Code: 8411

## ESG Report 2021

If you have any opinions regarding this Report, please contact our ESG reporting team via email.

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