



# Well Link Securities Holdings Limited

( Incorporated in the Cayman Islands with limited liability )

Stock Code: 8350



# 2023

ENVIRONMENTAL, SOCIAL  
AND GOVERNANCE REPORT



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# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## INTRODUCTION

Well Link Securities Holdings Limited (hereinafter referred to as the “**Company**”) and its subsidiaries (hereinafter collectively referred to as the “**Group**”) is committed towards sustainability and understands the importance of sustainable development of its business and community. This Environmental, Social and Governance report (the “**ESG Report**”) discloses the Group’s policies and practices for its commitment to sustainable development. As a platform for communication with all stakeholders, the ESG Report also makes responses to the major expectations of all stakeholders in efforts to facilitate mutual understandings.

The principal activities of the Group mainly provides brokerage services for futures, securities and options traded on the exchanges in Hong Kong, the United States, Japan, Singapore and the United Kingdom. The Group also provides margin financing business, equity and debt securities placing service, investment advisory services and money lending business.

## REPORTING SCOPE AND BOUNDARY

The ESG Report covers environmental and social performance of the core business of the Group in Hong Kong. Unless otherwise stated, the ESG Report covers specific ESG policies and performance from 1 January 2023 to 31 December 2023 (the “**Year**”) and is consistent with the annual report.

During the process of preparing this ESG Report, we have conducted a thorough review and evaluation of the existing ESG practices of the Group to achieve better performance results in the future.

This ESG Report contains information that is material for the stakeholders to understand the Group’s ESG practices and performance in its daily operations in Hong Kong. There is no change in the reporting boundary covered in this ESG Report from the previous year.

## PREPARATION BASIS

The ESG Report has been prepared in accordance with the Environmental, Social and Governance Reporting Guide (“**ESG Reporting Guide**”) as set out in Appendix 20 to the Rules Governing the Listing of Securities on GEM (the “**GEM Listing Rules**”) of The Stock Exchange of Hong Kong Limited (the “**Stock Exchange**”).

During the preparation for this ESG Report, the Group has applied the reporting principles stipulated in the ESG Reporting Guide as the following:

- “Materiality” – The materiality assessment detailed under the section headed “Stakeholder Engagement and Materiality Assessment” has ensured the ESG Report addresses the most material ESG topics pertaining to our businesses.
- “Quantitative” – Supplementary notes are added along with quantitative data disclosed in the ESG Report to explain any standards, methodologies, and source of conversion factors used during the calculation of emissions and energy consumption.
- “Consistency” – Whenever deemed material, the ESG Report details the standards, tools, assumptions and/or source of conversion factors used, as well as explanations of any inconsistencies to previous reports.

For the Group’s corporate governance practices, please refer to pages 10 to 23 for the section “Corporate Governance Report” contained the annual report.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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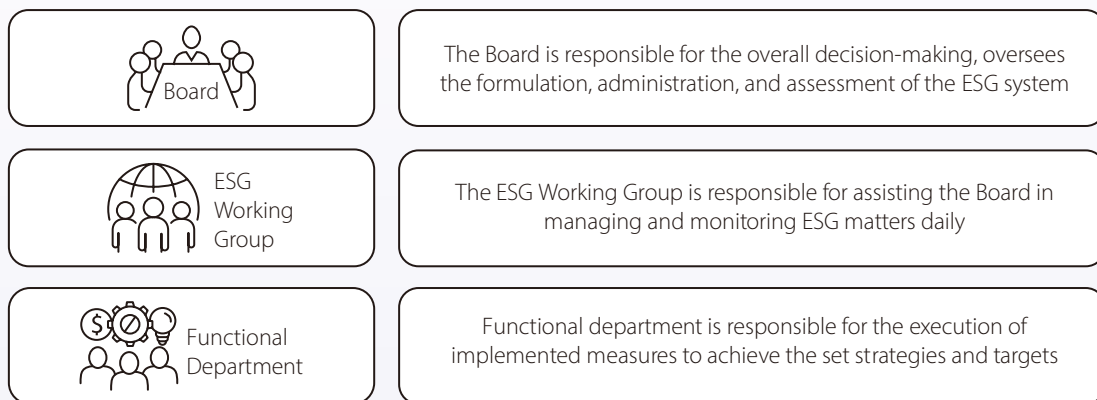
## BOARD STATEMENT – ESG GOVERNANCE STRUCTURE

The Board of Directors (the “**Board**”) is pleased to present the ESG Report of the Group in accordance with the ESG Reporting Guide published by the Stock Exchange, as contained in Appendix 20 to the GEM Listing Rules. The Group has fully embraced social responsibility as our contribution to address the ESG requirements and challenges society faces and implemented several significant initiatives relating to environmental protection, employment and labour practices, operating practices, and community investment.

We consider ESG commitment as a part of our corporate social responsibility and we will consider ESG into our decision-making process. To achieve this, we have developed a core governance framework to ensure the alignment of ESG governance with our strategic growth, while advocating ESG integration into our business operations. The structure of our corporate social responsibility is divided into two components, namely the Board and an ESG working group.

The Board holds the ultimate responsibility on monitoring the Group’s ESG issues, including ESG management approach, strategy, and policies. To better manage the Group’s ESG performance and identify potential risks, the Board conducts regular materiality assessment with the assistance of the ESG working group to evaluate and prioritise material ESG-related issues with reference to the opinions of our stakeholders.

The ESG working group, composing of core members from top management, is established to facilitates the Board’s oversight of ESG matters. The ESG working group is responsible for collecting and analysing ESG data, monitoring and evaluating the Group’s ESG performance, ensuring compliance with ESG-related laws and regulations, and preparing ESG reports. The ESG working group arranges regular meetings to evaluate the effectiveness of current policies and procedures and formulate appropriate solutions to improve the overall performance of ESG policies. At meetings, the ESG working group discussed the existing and upcoming plans to monitor and manage the Group’s strategic goals in terms of sustainable development, mitigate potential risks, and minimise their negative impacts on our business operations. By setting ESG-related goals and targets to minimise the environmental impacts from the Group’s operation, the Group affirmed its commitment in embedding sustainability into the business operation and fulfil its corporate responsibility. The ESG working group reports to the Board periodically, assist in assessing and identifying the Group ESG risks and opportunities, evaluate the implementation and effectiveness of internal control mechanism, and review the progress of the set goals and targets.



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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## STAKEHOLDER ENGAGEMENT AND MATERIALITY ASSESSMENT

The Group attaches great importance to multi-channel interaction with the stakeholders. The Group is actively looking for every opportunity to understand and engage our stakeholders to ensure that improvement of our services can be implemented. We strongly believe that our stakeholders play a crucial role in sustaining the success of our business. The following table provides an overview of the core stakeholder groups identified and our engagement methods.

| Stakeholders      | Probable points of concern   | Communication and response  |
|-------------------|--|---|
| HKEx              | Compliance with GEM Listing Rules, timely and accurate announcement  | Meetings, training, workshops, programs, website updates and announcements                      |
| Government        | Compliance with laws and regulations, prevention of tax evasion, contribution to social welfare  | Interaction and visits, government inspections, tax returns and other information               |
| Regulatory bodies | Compliance with laws and regulations, timely and accurate reporting and notifications  | Meeting, training, filing of reports and notifications  |
| Suppliers         | Payment schedule   | Site visit  |
| Investors         | Corporate governance system, business strategies and performance, investment returns   | Seminars, interviews, shareholders' meeting, financial reports for investors, media and analyst |
| Media and public  | Corporate governance, environmental protection   | News on the Company's website   |
| Clients           | Service quality, reasonable pricing, service value, personal data protection   | Site visits, customer services  |
| Employees         | Rights and benefits, employee compensation, training and development, work hours, working environment, labour protection and work safety | Training, interviews with employees, internal memo  |
| Community         | Community environment, employment and community development, social welfare  | Community activities, voluntary activities and donations  |

Social media accounts have been established in several social media platform to strengthen the communication between the Company and its stakeholders. The Group will increase stakeholders' engagement via general meetings, corporate websites, and constructive dialogue, with a view to driving long-term prosperity. The Group believes that sound ESG performance is important to the Group's sustainable business development and community.

The Group is committed to protecting and improving the ecological environment and social factors and minimising the impact of its activities on the environment. Throughout the stakeholder engagement exercise, the Group's management have assisted the Board to review its operations, identify key ESG issues and assess the importance of these issues to its businesses and stakeholders. It is the Group's policy to promote green operation, thereby gradually achieving the coordinated development of the Group, the environment, and the society. All identified material ESG issues, including environmental protection, employment and labour practices, product responsibility, and community investment, have been disclosed in the ESG Report. The Group will keep creating value for stakeholders and supporting charities and environmental protection.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT (continued)



## Information and Feedback

For detailed information about environmental and corporate governance, please refer to the annual report of the Group. Your opinions will be highly valued by the Group. If you have any advice or suggestions, please feel free to contact us by:

Email: [cs@wlis.com.hk](mailto:cs@wlis.com.hk)

## ENVIRONMENTAL PROTECTION

### Overview

Due to business nature of the Group, the Group does not involve any significant impact on nature resources. However, the Group executes practices that improve energy efficiency, conserves resources for its operation and raises environmental awareness for our employees. The key environmental impacts from the Group's operations related to energy and paper consumption. To achieve environment protection, the Group has gradually invested more in technology to enable processes to be done electronically and therefore reduce paper and printing consumption.

During the Year, the Group was not aware of any material non-compliance with relevant laws and regulations in Hong Kong relating to air and greenhouse gas ("GHG") emissions, discharges into water and land, and generation of hazardous and non-hazardous wastes. Such relevant laws and regulations include but not limited to the Air Pollution Control Ordinance (Cap. 311, Laws of Hong Kong) and the Waste Disposal Ordinance (Cap. 354, Laws of Hong Kong).

### Air Emissions

Due to the Group's business nature, no significant exhaust gas emissions are involved during daily operations.

The consumption of electricity at the office is the major sources of GHG emissions of the Group. To reduce the carbon footprint at the office, the Group is endeavouring to increase investment in energy-efficient equipment and monitor the energy usage monthly. Moreover, the Group encourages employees to switch off all computers and office equipment, electrical and air-conditioner at the end of each working day and set the room temperature of air conditioner to 25.5°C. As the Group does not own or operate any machineries including vehicles that consume fossil fuel such as petrol and diesel, no significant direct GHG emissions (Scope 1) are involved. The Group also encourages employees to use public transportation instead of private vehicles and encourages them to consider environmental impact in their commuting decisions to reduce air and greenhouse gas emissions. During the Year, the Group set a target of maintaining or reducing the total GHG emissions intensity (tCO<sub>2</sub>e/employee) in the next 3 years compared to the Year.

Below table outlines the GHG emission data during the Year and previous year.

|  | 2023 | 2022 |
|--|------|------|
| Carbon emission (Scope 2 only) <sup>1</sup> (tCO <sub>2</sub> e)             | 39   | 50   |
| Carbon intensity (tCO <sub>2</sub> e/m <sup>2</sup> floor area) <sup>2</sup> | 0.13 | 0.17 |

Notes:

- (1) We currently account for Scope 2 carbon emission (indirect emission from consumption of purchased electricity) only. According to the Sustainability Reports published by HK Electric, the carbon footprint per kWh of electricity sold in 2022 was 0.68kg.
- (2) As all carbon emissions are based on our office usage; thus, the floor area refers to the Group's own office only.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(continued)

## Finding and analysis

It is noted that the carbon emission reduced in 2023, as the Group remained conscious on energy savings as we expand our business.

## Waste Management

The Group adheres to the waste management principle and strives to effectively manage and dispose of waste produced by our business activities. Our waste management practices have complied with relevant laws and regulations relating to environmental protection. The Group adopts a policy for using of electronic documents instead of traditional paper usage apart from those required by regulatory bodies.

Due to the Group's business nature, no significant amount of hazardous waste is generated during daily operation. In case there are any hazardous wastes produced, the Group must engage a qualified chemical waste collector to handle the same in order to comply with the relevant environmental laws and regulations.

The non-hazardous waste generated by the Group's operations mainly consist of paper. To build a paperless workplace, the Group has invested more in technology so processes can be done electronically and encourages staff to shift to electronic documents or scanning to reduce paper consumption. Staff are encouraged to print documents double sided, reuse papers on both sides, send documents and greetings through electronic means such as by telephone, email, and other communication software, as well as to recycle documents when they are no longer necessary. We are also encouraging our clients to receive e-statements instead of physical statements to minimise the paper used. During the Year, the Group sets a target of maintaining or reducing the total non-hazardous waste by 10% in the next 10 years compared to the Year.

Below table outlines our non-hazardous waste generation data during the Year and previous year:

|   | 2023 | 2022 |
|---|------|------|
| Paper (in kg)   | 459  | 500  |
| Intensity (kg/m <sup>2</sup> floor area) <sup>1</sup> | 1.53 | 1.65 |

Note:

(1) As all the non-hazardous wastes was generated within the office area; thus the floor area refers to the Group's own office only.

## Finding and analysis

It is noted that the paper consumption this year reduced as we continued to invest in technology so more processes are completed paperless.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(continued)



## Use of Resources

Energy saving is important for all times and is the most critical means for the Group to continuously reduce greenhouse gas and carbon emissions. The Group has established relevant policies and procedures governing the use of energy and water to achieve higher efficiency and reduce unnecessary use of resources. While the Group will continue to improve energy saving for office, our focus is on existing air-conditioning and computer equipment and its infrastructure.

### (1) Energy Management

The Group's daily operations mainly consume electricity. The Group aims to minimise the environmental impacts that resulted from our operations by identifying and adopting appropriate measures. Energy measures and practices have been developed to show our commitment to improve energy efficiency. Employees are reminded to turn off all lights, air-conditioners, and electrical equipment before leaving the office. Air-conditioning is maintained at 25.5oC for energy saving. As the Group does not own or operate any machineries including vehicles using the consume fossil fuel such as petrol and diesel, no significant direct energy consumption is involved. During the Year, the Group set a target of maintaining or reducing the total energy consumption intensity (kWh/employee) in the next 3 years compared to the Year.

|  | 2023   | 2022   |
|--|--------|--------|
| Electricity consumption (kWh)  | 57,766 | 70,400 |
| Electricity consumption intensity (kWh/m <sup>2</sup> floor area) <sup>1</sup> | 0.19   | 0.17   |
| Electricity consumption intensity (kWh/employee)                               | 4,126  | 5,867  |

Note:

(1) As all carbon emissions are based on our office usage; thus, the floor area refers to the Group's own office only.

### Finding and analysis

The decrease in electricity consumption and electricity consumption intensity as the Group remained conscious on energy savings as we expand our business.

### (2) Water Management

Although the water consumption of the Group is limited to basic cleaning and sanitation in the office, the Group still promotes behavioural changes in the office and has taken regular inspection to prevent water leakage. Pantry is posted with environmental messages to remind employees of water conservation. Moreover, the Group requires employees to turn off the tap when not in use and report leaking faucet or pipe to the relevant authority in a timely manner.

As the water supply and drainage facilities of our offices are managed by the property management company of Group's rented premise, the Group was unable to access water consumption record during the Year. Due to the business nature and operating locations, the Group does not encounter any significant issue in sourcing water that is fit for purpose. During the Year, the Group set a target of further promote the employees' awareness on water conservation by implementing additional measures in the coming 3 years.

### (3) Use of Packaging Materials

Due to the business nature, the Group does not consume a significant amount of product packaging materials as the Group does not have any industrial productions nor any manufacturing facilities.



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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## The Environment and Natural Resources

The Group pursues the best practices in environmental protection and focuses on the impact of its businesses on the environment and natural resources. Due to the Group's business nature, its impact on natural resources is limited. In addition to complying with the relevant environmental laws and regulations as well as properly preserving the natural environment, the Group has integrated the concept of environmental protection into its internal management and daily operations, with an aim of achieving environmental sustainability.

The Group recognises the responsibility in minimising the negative environmental impacts of its operations in achieving sustainable development to generate long term values to its stakeholders and community. It carries out continuous monitoring on whether the business operations cause any potential impact on the environment and minimises such impact to the environment through promoting green office. Where applicable, the Group adopts green purchasing strategies to protect natural resources.

## Climate Change

Awareness over climate change continues to grow and is one of the most discussed topics among nations and countries. The Group recognises the importance of the identification and mitigation of significant climate-related issues, therefore closely monitors the potential impact of climate change on our business and operations and is committed to managing the potential climate-related risks which may impact the Group's business activities. In accordance with the reporting framework developed by the Task Force on Climate-related Financial Disclosures, there are two major categories of climate-related risks, physical and transition risks. The Group has implemented risk management exercise in identifying and mitigating climate-related risks.

### (1) Physical Risks

The increased frequency and severity of extreme weather events such as typhoons, storms, heavy rains, and extreme cold or heat bring acute and chronic physical risks to the Group's business. The Group's productivity will be reduced under extreme weather events as the safety of our employees is threatened and the power grid or communication infrastructures might be damaged, which exposes the Group to risks associated with non-performance and delayed performance, leading to direct negative impact on the Group's revenue.

To minimise the potential risks and hazards affected the region, the Group has established mitigation plans, including flexible working arrangements and precautionary measures during bad or extreme weather conditions. The Group will explore emergency plan to further reduce the vulnerability of our installations to extreme weather events in order to enhance business stability.

### (2) Transition Risks

To achieve the global vision on carbon neutrality, the Group expects evolution of the regulatory, technological and market landscape due to climate change, including the tightening of national policies and listing rules and the emergence of environmentally related taxes. Stricter environmental laws and regulations may expose enterprises to higher risks of claims and lawsuits, which might incur additional compliance costs and affect the reputation of the Group.

In response to the policy and legal risks as well as the reputation risks, the Group constantly monitors any changes in laws or regulations and global trends on climate change to avoid cost increments, non-compliance fines or reputational risks due to delayed response. In addition, the Group has been taking comprehensive environmental protection measures, including GHG reduction measures, has set targets to gradually reduce the Group's energy consumption and GHG emissions in the future.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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## EMPLOYMENT AND LABOUR PRACTICES

The Group promotes the corporate culture of “people-first” as talents are the most important assets. The Group is committed to creating a healthy and safe working environment for each employee and providing training and development for them. The Group continuously treats all employees equally in respect of recruitment, training and development, promotion, and welfare. All discrimination on gender, ethnic background, religion, and colour are prohibited. The Group strongly believes that diversity in our workforce brings more benefits to the Group and strives to create a diverse and intricately connected workforce as combining diverse cultures can bring us more ideas and innovations.

### Employment

Employees are the most valuable asset of the Group. The Group strives to provide a pleasant and healthy workplace for our employees. The Group cares for our employees and recognise that having good staff relations and a motivated workplace play a vital role in the Group’s efficient operation. In order to fully develop staff competence and potential, the Group has an Employee Handbook that ensure each staff understand the policy of the Group. Our Employee Handbook highlights general information about the Group and policies relating to staff employment. The contents of our Employee Handbook are subject to periodic review and changes will be notified by internal memorandum.

During the Year, the Group was not aware of any material non-compliance with employment-related laws and regulations in Hong Kong that would have a significant impact on the Group. The relevant laws and regulations include, but are not limited to, the Employment Ordinance (Cap. 57, Laws of Hong Kong) and the Minimum Wage Ordinance (Cap. 608, Laws of Hong Kong).

### Workforce Diversity

As at 31 December 2023, the Group had employed total 14 staff in Hong Kong (2022: total 17 staff). Total workforce by gender, age group, employment type and geographical region is as follows:

| Breakdown by gender |     |
|---------------------|-----|
| Female              | 29% |
| Male                | 71% |

| Breakdowns by age |   |
|-------------------|---|
| 21–30             | 2 |
| 31–40             | 4 |
| 41–50             | 3 |
| Over 50           | 5 |

| Breakdowns by employment category |      |
|-----------------------------------|------|
| Full time                         | 100% |

| Breakdowns by Geographic location |      |
|-----------------------------------|------|
| Hong Kong                         | 100% |

To offer equal opportunities to its employees to attract and retain talent, the Group is committed to being an equal opportunity employer and does not discriminate based on personal characteristics, gender, or age. Regardless of race, sex, colour, age, family background, ethnic tradition, religion, physical fitness and nationality, the Group provides its employees with equal opportunities in terms of recruitment, training and development, compensation, welfare, and benefits, as well as promotion to enhance their personal and career development. The Group establishes and implements policies that promote a harmonious and respectful workplace. With the aim of ensuring fair and equal protection for all employees, the Group has zero tolerance on sexual harassment or abuse in the workplace.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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## Recruitment, Promotion and Dismissal

Employees' qualification, professional skills and experiences exert a significant influence on the quality of services. In line with the need of business development and the principles of fairness and justice, the Group selects the best and suitable qualified candidates through open recruitment or internal promotion. The Group applies robust and transparent recruitment processes based on merit selection against the job criteria, and recruit individuals based on their suitability for the position and potential to fulfil the Group's current and future needs.

Performance evaluations will be re-initiated each year for promotion. Recognising the value in the skill and experience of our staff, the Group intends to adopt a policy that any promotions will be considered internally first before hiring any outside staff. It is the Group's policy to select the most suitable candidate for appointment to a higher rank based on merit, rather than on the seniority of the candidates. Staff salary payment and promotion will be measured against their progressive performance level, contribution, and achievement against the objectives set by the Group. The annual performance evaluation will be conducted annually. During the performance discussion, staff and management team will meet and talk about the expectations of their jobs so that a mutual understanding of staff responsibilities and performance objectives for the year can be reached.

Any termination of employment contract should be based on reasonable, lawful grounds and internal policies, such as the Employee Handbook. The Group strictly prohibits any kind of unfair or illegitimate dismissals. For those who have unsatisfactory working performance or repeatedly made mistakes, the Group would give verbal warning before issuing a warning letter. For those who shows no improvement, the Group would consider dismissing the employees according to the relevant laws in Hong Kong.

During the Year, the Group recorded a turnover rate of approximately 43% (2022: approximately 13%). The table below shows the employee turnover rate by gender and age group:

| Breakdown by gender |     |
|---------------------|-----|
| Female              | 14% |
| Male                | 29% |

| Breakdown by age group |     |
|------------------------|-----|
| 21–30                  | –%  |
| 31–40                  | 66% |
| 41–50                  | –%  |
| Over 50                | 33% |

## Remuneration and Benefits

The Group's remuneration package is structured with reference to the individual performance, working experience and prevailing salary levels in the market. In addition to basic salaries and mandatory provident fund ("MPF"), staff benefits include a basic five-day working week, flexible leave arrangement, medical coverage scheme, festival gift, and annual party. The Group offers a minimum of 7 days of annual leave and additional leaves, including compensation leave, maternity leave, compassionate leave, and exam leave, to staff. The Group also holds social gathering activities and encourages employees' voluntary participation aiming at providing opportunities for employees to get connected with each other and creating a harmonious working environment. It is mutually beneficial to both the Group and employees as it provides employees a sense of belonging and self-worth while positive work relationship helps foster better collaboration and work performance.

The turnover rate for the Group this year was high, because the controlling shareholders of the Group has changed, and therefore the one-off restructuring has caused a number of staff to leave the Group.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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## Work-life Balance

The Group values the importance of maintaining a healthy lifestyle and work-life balance of its employees. The Group actively engages its employees through different work-life balancing social activities. Besides, the Group regulates working hours and provides overtime work compensation for those employees working in field operations.

## Health and Safety

The Group makes the health and life safety of its employees in a close attention focus. The Group provides its employee with flexible rest leave arrangement, medical and hospital scheme. The Group also aware that the good working environment for its employees with a safe and comfortable working condition is particularly important. The Group has set work arrangement for typhoon and rainstorm warning. In the past years under review, zero staff fatalities or serious work-related injuries from the Group's operation. The Group shows its genuine care for its employees.

During the Year, the Group was not aware of any material non-compliance with the health and safety-related laws and regulations in Hong Kong that would have a significant impact on the Group. The relevant laws and regulations include, but are not limited to, the Occupational Safety and Health Ordinance (Cap. 501, Laws of Hong Kong) and the Employees' Compensation Ordinance (Cap. 282, Laws of Hong Kong). During the Year, there were no reported cases of work-related injuries, thus zero lost days due to work injury. The Group has achieved zero work-related fatalities in the past three years.

## Workplace Safety

First aid kits are located at the pantry of the Group at a easily visible area and it has been clearly marked "FIRST AID" and its contents be maintained in a serviceable condition at all times as required by Occupational Safety and Health Branch. A notice specifying the name of the staff responsible for the first aid box is affixed to it. The Group has carried out the visual inspections of fire extinguishers to comply with legislation every year. The Group has also appointed the registered company which is qualified and experienced to conduct service and maintenance of fire extinguishing equipment once a year to make sure the fire extinguishers in the office are proper for use when necessary.

## Development and Training

The Group believes that the quality of its employees is the most crucial factor in sustaining the Group's growth and improving its profitability. Training that providing employees with the opportunities to learn pays dividends for the Group and its employees. The Group gets better-skilled staffs who are more versatile and flexible in their assignments, and employees get the opportunity to learn new skills, gain new ways of viewing the world, and network with others.

The Group has arranged staff in training regularly during the Year. Staff participated in training build skills and stay up to date with regulatory changes. Apart from the training courses or seminars sponsored by the Group, all employees can apply for training courses and examination leave that are recommended by their managements, which in their view, is beneficial both to the Group's corporate direction and to the employees' career development to obtain up-to-date information in financial industry.

During the Year, all employees have received training offered by the Group, while the average training hours completed per employee was approximately 2 hours (by gender – male: 2 hours, female: 2 hours; by employment category – senior management: 2 hours, middle management and other employees: 2 hours).

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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## Labour Standards

The Group has complied with relevant labour laws and government regulations set out by the Hong Kong Government. The Group does not employ staff who are below 18 years of age. No employee is paid less than the minimum wage specified by the government regulations. Monthly salary payments are made on time according to the Employee Handbook and MPF paid for a contribution period before monthly contribution day.

During the Year, the Group was not aware of any material non-compliance with child and forced labour-related laws and regulations in Hong Kong that would have a significant impact on the Group. The relevant laws and regulations include but are not limited to the Employment of Children Regulations (Cap. 57B, Laws of Hong Kong) and the Employment Ordinance.

## OPERATING PRACTICES

### Supply Chain Management

The Group recognises the importance of sound supply chain management practices in mitigating environmental and social risks, and therefore, formulated policies and guidelines for various aspects of its customer service, including standardised operating procedures and staff training.

The Group prioritises the quality of service providers to sustain top notch standards of our service offerings and strives to collaborate and maintain stable partnership with service providers who possess qualifications or expertise in their respective fields. Periodic review of suppliers' performance is conducted to ensure that their services are performed in excellent quality and consistently.

### Green Procurement

The Group pays attention to the environmental awareness of its suppliers and promotes sound environmental performance and governance practices amongst its business partners and suppliers. The Group encourages its business partners and suppliers to consider the risks posed to their operations from climate change and to actively mitigate their environmental impacts during supplier conference. Besides, close monitoring on the suppliers' business practices through onsite inspections is performed. Any observations of non-compliance during the site visit will be reported immediately to the management. Corrective action plan will be carried out to remediate the identified risks in a timely manner.

Due to the business nature, the Group does not procure a significant amount of materials during the Year.

### Product Responsibility

As a company engaged in brokerage business, the Group emphasises the reliability of the services offered to our clients. Our IT department monitors the network status of the brokerage service 24/7 to ensure the connectivity of our services is not interrupted. Besides, the Group regularly invested network infrastructure in order to maintain good and speedy services to the customers.

During the Year, the Group was not aware of any incidents of non-compliance with laws and regulations in Hong Kong that have a significant impact on the Group, concerning product health and safety, advertising, labelling, and privacy matters relating to products and services provided. The relevant laws and regulations include, but are not limited to, the Supply of Services (Implied Terms) Ordinance (Cap. 457, Laws of Hong Kong) and the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong) and Trade Descriptions Ordinance (Cap. 362, Laws of Hong Kong).

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT (continued)



## Customer Services and Data Protection

The Group pays special attention to confidentiality and privacy issue of the Group and all the stakeholders. The Group complies with the Data Protection Principles in the Personal Data (Privacy) Ordinance to prevent misuse and leakage of the personal data. All of the stakeholders' personal data are only for commercial operation purposes of the Group and shall never be resold to any third parties. Employees are required to sign a confidentiality agreement acknowledging receipt and agreement of their responsibility and obligation regarding the protection and non-disclosure of customer data. All computers together with backup services are equipped with security features which require password access. The Group maintains and enhances the physical and electronic systems from time to time in order to prevent leakage of the personal data. During the Year, there were no issues occurred concerning any losses of data.

## Intellectual Property Rights Protection

The Group attaches importance on protecting intellectual property rights and has developed policies in accordance with all applicable legal requirements to prohibit intellectual property infringement. The Group has registered trademarks which are including the company logo, "Well Link" etc. The Group has not encountered any material breaches of relevant laws and regulations relating to privacy and intellectual property rights in the Year.

## Advertising and Labelling

In the Group's dealings with its clients, information provided were complete, true, accurate, clear, and comply with all regulatory bodies, relevant laws and regulations regarding the proper advertising. In the event there is misleading information in the Group's advertising or marketing activities, explanations and provide necessary compensation to our clients will be made and the advertisements will be modified or withdrawn.

## Anti-corruption/Anti-money Laundering

The Group is committed to maintain the integrity of its corporate culture. No form of corruption or bribery is tolerated. The Group strictly complies with all anti-money laundering and counter-terrorist financing laws, regulations and guidelines in Hong Kong, such as the Prevention of Bribery Ordinance and the Anti-Money Laundering and Counter-Terrorist Financing Ordinance. All directors and employees must strictly comply with the Employee Handbook to prevent any action of bribery, corruption and money laundering and they shall also follow relevant rules and guidelines when any conflict of interests arises. Anti-money Laundering Seminar will be held yearly to update the employees on the latest policy and regulations and reinforce their knowledge of recognising and dealing with money laundering and terrorist financing. The Group will not tolerate employees to accept gifts, entertainment activities or any advantages which do not comply with the normal social etiquette and ethical business practices. Employees are welcome and have responsibility to report all improper behaviours, misconduct or malpractice at work. All reports and disclosed information will be treated in the strictest confidence.

During the Year, the Group was not aware of any material non-compliance with the relevant laws and regulations of bribery, extortion, fraud, and money laundering. The relevant laws and regulations include, but are not limited to the Prevention of Bribery Ordinance (Cap. 201, Laws of Hong Kong). During the Year, there is no legal cases regarding corrupt practices brought against the Group or its employees.

During the Year, all directors have participated in appropriate continuous professional development activities by attending training course on the topics related to corporate governance and regulations or by reading materials relevant to the Company's business or to their duties and responsibilities. The Group will provide training to our directors and employees on anti-corruption practices in the ensuing financial year.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(continued)

## Whistle-blowing Mechanism

The Group believe in an open-door policy with regards to problem-solving; whenever staff has a good-faith problem or complaint, the Group expect staff to speak up and communicate with their manager or directly with senior management/director. The Group encourage staff to take the above action immediately after any event causes his/her concern. Furthermore, the Group also encourage staff to contribute their suggestions/minds to improve the quality of work at the Group.

## Community Investment

The Group is committed to supporting social participation and contribution, and to nurture the corporate culture and practices of corporate citizen in its daily operation. The Group encourages our staffs to participate in volunteering events and charitable activities, which could provide an opportunity for them to connect outside the workplace while contributing to the local communities, and the Group targets through donations and sponsorships by supporting non-profit-making organisations to help charitable, cultural, educational, and other needs of society.