

## TradeGo FinTech Limited 捷利交易寶金融科技有限公司

(Incorporated in the Cayman Islands with limited liability) (Stock Code : 8017)



# 2023

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT



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# 1. ABOUT THIS REPORT

TradeGo FinTech Limited ("**TradeGo**" or the "**Company**") and its subsidiaries (the "**Group**" or "**we**") are pleased to announce our sixth environmental, social and governance report (the "**ESG Report**" or the "**Report**"). This Report explains our work and key performance indicators in environmental and social areas during the period from 1 April 2023 to 31 March 2024 (the "**Reporting Period**" or the "**Year**"), demonstrating to stakeholders our principles and concept of sustainable development when fulfilling our corporate social responsibility.

#### **Reporting Standards**

This Report is prepared in accordance with rule 17.103 and the requirements of the "Environmental, Social and Governance Reporting Guide" (the "**Guide**") as set out in Appendix C2 to the Rules Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited (the "**Hong Kong Stock Exchange**"), and is in compliance with the "General Disclosures" and "Comply or Explain" provisions under the Guide, with additions of recommended disclosures. Readers may refer to the last section headed "APPENDIX II: THE HONG KONG STOCK EXCHANGE ESG REPORTING GUIDE INDEX" of this Report for quick reference.

#### **Reporting Scope**

Unless otherwise stated, the content of this Report covers the business directly controlled by the Group and data from our Shenzhen offices was collected for assessment of environmental key performance indicators. For details of the Group's corporate governance, please refer to the section headed "Corporate Governance Report" in the Group's 2023 Annual Report or visit the Group's official website (www.tradegomart.com).

#### **Reporting Language**

This Report is published in both Traditional Chinese and English. In case of discrepancies, the Chinese version shall prevail.

#### Feedback on the Report

As perfection is the Group's constant pursuit, we highly value your comments on this Report. If you have any enquiries or suggestions on this Report or the Group's sustainable development strategies, please feel free to contact us via email at master@tradego8.com.

# 2. ABOUT THE GROUP

The Company is one of the leading integrated securities trading platform service providers, serving primarily Hong Kong brokerage firms and their clients. As a financial services provider, we are committed to assisting customers in achieving their goals by offering convenient and quick securities trading services. Through our self-developed securities trading platform software ("**TradeGo APP**"), the Company mainly provides five types of services, namely (1) front office trading system services; (2) market data services; (3) hosting and cloud infrastructure services; (4) SaaS services; and (5) other value-added services.

The Group continues to improve its integrated securities trading platform services to keep pace with regulatory and new industrial requirements. Our securities trading platform software supports transactions in a variety of financial instruments, including stocks, ETFs, futures, options, warrants and derivatives. Customers and end users can log onto our securities trading platform software through various channels such as major operating systems (including Microsoft Windows, MacOS, Android and iOS) as well as mainstream platforms (such as web browsers) and conduct securities trading operations. The Group has provided cloud-based market and trading integrated terminal products and system services to 155 brokerage clients and has helped them improve operational efficiency through our various products.

The Group provides registered users with value-added services such as initial public offering ("**IPO**") information, market quotes, listed company information, online account opening services, IPO subscription services and share trading services through TradeGo Pro. As at 31 March 2024, the Group has more than 810,000 registered users.

TradeGo Markets Limited ("**TradeGo Markets**"), an indirect wholly-owned subsidiary of the Group, is a licensed corporation under the Hong Kong Securities and Futures Ordinance (the "**SFO**") to carry out regulated activities of dealing in securities and providing automated trading services with Type 1 and Type 7 licenses granted by the Securities and Futures Commission of Hong Kong (the "**SFC**"). The licences were effective on 16 February 2023 and TradeGo Markets commenced its business engaging securities brokerage and dealing services and underwriting and sub-underwriting services during the year ended 31 March 2024. To align with the development trend in Hong Kong, TradeGo Markets plans to apply for virtual asset dealing permission from the SFC, in accordance with business conditions, and launch the "Hong Kong Web3.0 Digital Asset Integration" solution to better serve the increasing need for professional crypto services by enterprises. The Group will require infrastructure and other R&D efforts in launching the solution platform.

## 3. SUSTAINABLE DEVELOPMENT STRATEGY

The Group is committed to incorporating sustainability into its daily operations. We have established the Corporate Environment Policy (《企業環境政策》), comprising four areas, namely product and service, staff, environment and community, and mapped out the direction of the corporate social responsibility efforts we deploy beyond business development. During the Year, based on the scope of the Corporate Environment Policy and in line with our latest business development, we outlined four key focuses as the strategy of sustainable development, namely "quality services", "staff caring", "green operations" and "contribution to the society".



#### 3.1. Board Statement

TradeGo has been working on the Group's sustainable development. We have established an Environmental, Social and Governance Committee (the "**ESG Committee**"), comprising executive directors, chief operating officer and senior management of the functional department. Led by the board of directors (the "**Board**"), the ESG Committee draws up the Group's strategic planning and policies on environmental, social and governance (the "**ESG**"), and promotes integration of sustainability into the decision-making processes and daily operations of the business units. The Board assumes final responsibility for the Group's ESG strategy and reporting. Through materiality assessment, we understand stakeholders' expectations, identify and prioritise material ESG issues to develop appropriate ESG approaches and strategies.

We identify and assess major ESG risks that may have an impact on us, including data security, privacy protection, intellectual property rights/patent protection, and formulate various systems to manage these risks. We are also aware of climate-related risks such as the possibility of extreme weather leading to service disruptions and temporary office closures, and therefore we have set out corresponding measures to mitigate the negative impact of these risks. We have set environmental targets, covering areas of energy efficiency, water use efficiency, waste reduction and greenhouse gas emissions, and will monitor and review their fulfillment in the future so as to reduce consumption of natural resources and the impact of our business operations on the environment.

#### 3.2. ESG System

The Group has established the ESG Committee, comprising executive directors, chief operating officer and department heads of the Company, for the purpose of managing the Group's ESG related issues. The ESG Committee regularly reports to the Board on the direction and progress of ESG work, assesses ESG risks and reviews whether relevant internal control system is appropriate and effective. The ESG Committee also assists the Board in assessing, determining and prioritising material ESG issues pertinent to the Group.

The major duties of the ESG Committee are as follows:

Identify the ESG matters that have a material impact on the Group and its stakeholders, including the quality of working environment, environmental protection, operational practices and community participation;

Maintain the operation of the corporate social responsibility management system and enhance the corporate social responsibility awareness among our staff;

Promote the implementation of ESG management, ESG strategies and working plan, so as to achieve the Group's goals and objectives;

Identify and solicit stakeholders' opinions on material ESG matters through appropriate channels and respond accordingly;

Review and monitor the Group's ESG policies and practices;

Ensure that the Group complies with relevant legal and regulatory requirements, monitor and respond to the latest ESG issues;

Propose suggestions to the Board at an appropriate timing, so as to improve the Group's ESG performance.

#### 3.3. Stakeholders' Engagement

While actively developing our business, we are also sensitive to the concerns and expectations of our stakeholders. We value various stakeholders (including customers, suppliers and employees), both internally and externally, and collect their valuable advice through a wide range of channels. Their advice helps us to stay abreast of the market, improve our business performance, as well as to identify the downside of our previous work, inspiring us to explore future opportunities for sustainable development.

Major stakeholders	Main topics of concern	Communication channels
Customers	<ul> <li>Customer services</li> <li>Customer benefits</li> <li>Data security</li> <li>Complaint handling</li> </ul>	<ul> <li>Customer satisfaction survey and feedback form</li> <li>Customer service centre</li> <li>Daily operation/communication</li> <li>Online service platform</li> <li>Telephone and service hotline</li> <li>Mails</li> <li>Company website</li> </ul>
Shareholders/ Investors	<ul> <li>Economic performance</li> <li>Compliant operations</li> <li>Information transparency</li> <li>Effective communication</li> </ul>	<ul> <li>Annual general meetings and other shareholders' meetings</li> <li>Interim reports and annual reports</li> <li>Corporate communication, such as announcements, letters/ circulars to shareholders and meeting notifications</li> <li>Results announcements</li> <li>Company website</li> </ul>
Staff	<ul> <li>Remuneration and welfare</li> <li>Occupational safety and health</li> <li>Economic performance</li> <li>Training and development</li> <li>Effective communication</li> </ul>	<ul> <li>Staff's channels to express opinions (forms, suggestion boxes, etc.)</li> <li>Work performance appraisals</li> <li>Interviews</li> <li>Business presentations</li> <li>Special consultation committees/panels</li> <li>Seminars/lectures</li> <li>Staff communication conferences</li> </ul>

Major stakeholders	Main topics of concern	Communication channels
Business partners/ Peers	<ul> <li>Compliant operations</li> <li>Harmony and integration</li> <li>Common development</li> </ul>	<ul><li>Meetings</li><li>Visits</li><li>Group's announcements</li></ul>
Regulators	<ul> <li>Information transparency</li> <li>Compliant operations</li> </ul>	<ul> <li>Written response to public enquiries</li> <li>Compliance reports</li> <li>Mails</li> </ul>
Media	Information     transparency	Results announcements
Community/ Non-governmental organisations	<ul><li>Community welfare</li><li>Environmental protection</li></ul>	<ul><li>Community activities</li><li>Mails</li><li>Company website</li></ul>
Professional groups	<ul><li>Compliant operations</li><li>Information exchange</li></ul>	<ul><li>Meetings</li><li>Mails</li><li>Regular visits</li></ul>

#### 3.4. Materiality Assessment

To enhance the materiality of our sustainability disclosures, stakeholders were invited to take a questionnaire to prioritise ESG issues by scores. Based on the results of the materiality assessment, we focus our disclosures on the issues of most concern to our stakeholders.

Establishing a list of material issues	We established a list of material ESG issues that are most relevant to stakeholders and the Group's business by referring to a wide range of standards and guidance, including the relevant rules and guidance of the Hong Kong Stock Exchange, the Sustainability Accounting Standards Board (" <b>SASB</b> ") materiality map and industry trends.
Conducting a questionnaire on material issues	We invited stakeholders, including management, directors, customers, staff and professional groups, to take an online questionnaire and rank different issues according to materiality.
Determining priorities for ESG issues	We reviewed the priorities for each issue based on the two dimensions of "materiality to business" and "materiality to external stakeholders", and compiled the results of the materiality assessment.

#### TradeGo Materiality Matrix



Materiality to the Group's Business

Materiality	No.	Material issues
High	1.	Risk management
	2.	Green operations
	3.	Staff remuneration and welfare
	4.	Data security
	5.	Corporate governance
	6.	Compliant operations
	7.	Customer's privacy protection
	8.	Customer service management
	9.	Intellectual property rights
	10.	Staff health and safety
General	11.	Compliant employment
	12.	Staff diversity and equal opportunity
	13.	Business ethics
	14.	Anti-corruption
	15.	Staff training and development
	16.	Greenhouse gas management
	17.	Prevention of child labour and forced labour
	18.	Procurement and supply chain management
	19.	Response to climate change
	20.	Investors relations
	21.	Anti-competitive behaviour
	22.	Community charity

# 4. QUALITY SERVICES

As the Group actively expands its business, it also makes significant investments in innovation and R&D to improve quality and service efficiency. We strive to provide users with a user-friendly and high-quality front office trading system experience and have put in place various risk management and internal control policies to operate our business in a pragmatic manner and in strict compliance with business ethics and compliance standards.

#### 4.1. Anti-corruption

The Group abides by laws and regulations such as the Supervision Law of the People's Republic of China (the "PRC") (《中華人民共和國監察法》), the Securities Law of the PRC (《中華人民共和國證券法》), the Company Law of the PRC (《中華人民共和國公司法》), the Criminal Law of the PRC (《中華 人民共和國刑法》), the Regulation on the Supervision and Administration of Securities Companies of the PRC (《中華人民共和國證券公司監督管理條例》), the Regulation on the Administration of Futures Trading (《期貨交易管理條例》), the Measures for the Compliance Management of Securities Companies and Securities Investment Fund Management Companies (《證券公司和證券投資 基金管理公司合規管理辦法》), the Guidelines for the Compliance Management of Securities Companies (《證券公司合規管理實施指引》), and the Anti-Money Laundering Law of the PRC (《中華人民共和國反洗錢法》). The Group's operation in Hong Kong is also subject to Prevention of Bribery Ordinance (《防止賄賂條例》), Anti-Money Laundering and Counter-Terrorist Financing Ordinance (《打擊洗錢及恐怖分子資金籌集條例》) and other relevant laws and regulations of Hong Kong regarding anti-corruption, bribery, extortion, fraudulent behaviour and money laundering.

As a financial services provider, we attach particular emphasis to financial related compliance and provide top-to-bottom oversight of the Group's operations for compliance with governance practices and laws. We have established an audit committee, comprising three independent non-executive directors, to review and monitor our financial reporting procedures and internal control systems. It regularly reviews the effectiveness of our risk management and internal control systems, makes recommendations to the Board on matters relating to corporate governance, and rectifies any issues at an early stage. Our compliance department publishes the Risk Compliance and Internal Control Management Report (《風險合規及內控管理報告》) every year, which provides an overview of legal compliance, the current state on risk management, business oversight and inspections, etc. During the Reporting Period, there were no significant monitoring failures and no matters were brought to the attention of the Board.

We have appointed dedicated finance staff and filing managers for the management of the Group's funds, bills and contracts. All aspects relating to the movement of funds are governed by established approval processes, including external purchases, outsourcing of services, recruitment of staff, salary adjustments, sales and expenses, etc. Staff are required to follow procedures in handling outflows of funds, and relevant applications are subject to the approval of designated departments such as administration department, compliance department, finance department, sales department and even the chairman.

Our business is closely linked to trading in the financial markets. To avoid the risk of insider trading, the Company has established an inside information disclosure policy which sets out guidelines on the reporting and dissemination of inside information, and requirements of the confidentiality and compliance with trade restrictions for staff. The Board also reviews and assesses the risk of leakage of inside information on a regular basis and will report any leakage of inside information as soon as it is discovered.

During the Reporting Period, the Group did not identify any lawsuits against the Group or the employees, or any cases of corruption, bribery, extortion, fraud and money laundering.

#### 4.2. Information Security System

We are a leading integrated securities trading platform service provider, offering front-office trading system services and market data services to brokerage firms through an integrated platform based on cloud services and proprietary software. As the platform contains trading data and personal information, we are highly concerned about the security of our information and network systems and have put in place various guidelines and procedures to prevent data leakage. The Group always regards the protection of information security as the top priority, and is committed to ensuring information system security in all directions.

#### 4.2.1. Enhancement of Network System Security

The Group has established a risk management system and continuously monitors regulatory requirements, market trends and business developments to identify and manage related risks at an early stage. The risks of the Group in respect of information security are the risks of accidental intrusion into or malware attacks on our network security management systems and the possibility of abrupt system failures in our technology infrastructure, which could lead to operational disruptions.

In view of this, we have set up a network security inspection team to assess and predict the possibility and channels of hacking or virus attacks, and to reinforce our systems against them. We have conducted cyber-attack drills and set up contingency and recovery plans to enhance the preparedness of our technical staff in the event of an intrusion or attack on our network systems. We have also set up an IT network perimeter control team to monitor the network situation with real-time data, so that problems can be dealt with as soon as possible to avoid disrupting the normal operation of the trading platform. The data collected will also be used to analyse system vulnerabilities to improve the system situation.

We also conduct regular system testing and assessment, and provide cyber security training to our technical staff to enhance the capability of our technical team to combat cyber-attacks.

#### 4.2.2. Customer Privacy Protection

We strictly comply with the Confidentiality Law of the PRC (《中華人民 共和國保密法》) and the Implementation Measures of the Confidentiality Law of the PRC (《中華人民共和國保密法實施辦法》) to ensure the security of relevant data and protect the privacy of our clients. We have also established a number of systems to regulate the handling of personal data. We have compiled the Password and Permission Management System (《密碼與權限管理制度》), the Computer Equipment Management System (《計算器設備管理制度》) and the Company's Computer Room Security Management System (《公司機房安全管理制度》) to enhance the management of electronic devices through measures such as account management, prohibition of pirated software installation, setting up multi-level password and restriction on users' authority. In terms of data handling, we stipulate that employees shall not disclose to anyone all undisclosed data and business information related to the Group acquired during their employment without prior consent of the Group. We require post-leaving personnel who acknowledge and possess our business secrets to sign relevant confidential agreements. We also require management approval for the disposal of data storage devices, and record the date of disposal and related data, so as to ensure the data has been completely deleted and prevent leakage of customer and company information.

#### 4.3. Intellectual Property Rights

We highly respect the intellectual property rights of the Group and other third parties, and consider them as one of the most valuable assets of the Group. Since we have invested a lot of resources in Research and Development ("R&D") and service enhancement, we are committed to protecting our proprietary intellectual property rights. In case of any infringement of our intellectual property rights, we will assess its materiality and impact on our reputation and operations and consider taking legal action if necessary. Apart from protecting our own property rights, we also respect the intellectual property rights of other products and strictly comply with the laws and regulations such as the Patent Law of the PRC (《中華人民共和國專利法》), the Rules for the Implementation of the Patent Law of the PRC (《中華人民 共和國專利法實施細則》), the Trademark Law of the PRC (《中華人民共和國 商標法》), the Intellectual Property Law of the PRC (《中華人民共和國知識 產權法》), the Patent Ordinance (《專利條例》) and the Copyright Ordinance (《版權條例》) of Hong Kong. We also standardise the intellectual property management including trademark rights, patent rights, copyrights, etc. In our daily operations, we may also refer to various data, content, images and other data involving the copyrights of others, and we pay extra attention to whether we have obtained the permission or authorisation from the copyright owner when using such data.

#### 4.4. Product Quality

We place great emphasis on quality control to ensure that our customers have a smooth and convenient experience with our platform services and browsing investment information. Our quality control efforts cover all aspects of our business, from the procurement of cloud servers, product development, data storage to infrastructure maintenance, with checks in place. Regarding the software development phase, we have complied with specific guidelines based on the standard of Capability Maturity Model Integration Level 3, a process level improvement training and appraisal standard administered by the CMMI Institute. We continue to expand hardware infrastructure capabilities by purchasing test mobile phones of different models from different manufacturers to enhance the compatibility of our software with different devices. Besides, we conduct product testing to ensure that the service works in a variety of hardware equipment and operating systems. We also acquire and upgrade software for R&D and for office use and enhance the conversion efficiency and transition stability from physical to virtual servers.

In addition, we are committed to developing our own services and features to meet the needs of our customers, with industry-standard facilities such as servers, network equipment, testers and security controls to facilitate our R&D activities and improve the standard and quality of our services and products.

#### 4.5. Customer Services

The Group values the opinions of our customers and is committed to providing them with quality services. We strive to understand the needs and expectations of our customers and collect valuable feedback from them through our dedicated customer service team, and we also collect feedback from our customers on a monthly basis. We continue to receive, respond to and follow up on customer feedback on our products and services through various customer communication channels, including customer hotline, email, fax, instant messaging, web forums, onsite visits, etc. If we receive a customer request or enquiry, our customer service team will work closely with our system maintenance centre and R&D department to solve problems encountered by our customers with our professional knowledge.

During the Reporting Period, the Group received a total of 240 complaints from our customers, all of which have been dealt with. During the Year, the number of complaints jumped from 180 in 2022, which was attributable to the launch of upgrade projects for trading version of various APPs during the Year, where more feedbacks were received after the launch of the new trading version due to defects in development or pre-testing. The customer service rating during the Reporting Period reached 84.80%.

#### 4.6. Supply Chain Management

We continue to manage our supply chain and procurement practices to ensure the quality of our products and services. Our suppliers primarily include market data providers and cloud infrastructure service providers. The suppliers will be selected in accordance with our established evaluation criteria including their qualifications, service quality, supply capability, price, operational status and reputation before they are engaged. The main responsibilities of our procurement staff include reviewing the procurement requirements formulated by our R&D and sales and marketing departments, and negotiating and communicating the terms with the suppliers. In terms of society, we refrain from suppliers who are involved in corruption, bribery, extortion, fraud and money laundering. In terms of environment, we encourage the selection of green suppliers and take environmental considerations into account when procuring products, such as higher recycling efficiency, lower packaging costs, longer life span and higher energy efficiency. We adopt the "first-purchase, first-use" principle to avoid wastage due to missed expiry dates. During the Reporting Period, among our major suppliers, 3 of them were from Mainland China and 2 of them from Hong Kong.

## 5. CARING FOR EMPLOYEES

The Group recognises that its employees are not only contributors to the Company, but also valuable assets of the Company. We are committed to protecting the legal rights and interests of our employees, building an equal, inclusive, healthy and safe working environment, and investing in staff training to create a professional and efficient team.

#### 5.1. Staff Rights

The Group strictly complies with laws and regulations such as the Labour Contract Law of the PRC (《中華人民共和國勞動合同法》), the Labour Law of the PRC (《中華人民共和國勞動法》), the Law on the Protection of Minors (《未 成年人保護法》), the Provisions on the Prohibition of Using Child Labour (《禁 止使用童工的規定》) and the Employment Ordinance (《僱傭條例》) of Hong Kong. We have established a Staff Handbook (《員工手冊》) which stipulates that suitable employees are to be employed based on their educational background, experience and other relevant conditions, irrespective of gender, marital status, age, race and religion. The Group recruits in a variety of ways, taking into account educational background, experience and other related qualities. We verify relevant personal information of suitable candidates and the human resources and administration department would check their identification documents and age to prevent child labour at source. We also prevent forced labour by clearly stating the working hours of our employees in the employment letters. In case of any violation, we will handle the situations in accordance with clear stipulation in the Staff Handbook of the Group.

We are open to resignation of our employees. Pursuant to the requirements of individual employment contract and dismissal policy, employees must be given due notice before dismissal and handover procedure shall be implemented. Human resources staff will meet with the resigning employees to understand the reasons for their departure. We will review whether the departure is relevant to the management and make early improvements if there are any problems.

During the Reporting Period, no case of child labour or forced labour was identified in the Group. As of 31 March 2024, the Group had a total of 151 employees. The following charts show the proportions of our employees classified by gender, age group, employment type and geographical region:



#### 5.2. Occupational Safety and Health

The Group attaches great importance to the health and safety of our employees. The Group complies with the laws and regulations such as the Law of the PRC on the Prevention and Control of Occupational Diseases (《中 華人民共和國職業病防治法》), the Production Safety Law of the PRC (《中華人 民共和國安全生產法》), the Provisions on the Supervision and Administration of Occupational Health at Work Sites (《工作場所職業衛生監督管理規定》), the Regulation on Work-related Injury Insurances (《工傷保險條例》), as well as the Occupational Safety and Health Ordinance (《職業安全及健康條例》) of Hong Kong, striving to create a safe, healthy and pleasant working environment for all employees. Even though we operate daily business mainly in the office, a relatively simple and safe working environment, we never let up. Thus, we have prepared a series of occupational safety and health guidance, and maintain sufficient first-aid supplies and fire protection equipment in our office for emergency uses. We also actively participate in the regular fire drills, so as to enhance our employees' ability to respond to crisis. In addition to creating a safe working environment for employees, the Group also cares for employees' physical and mental health by providing them fitness equipment such as treadmill, elliptical machine and dumbbell to exercise and help them relieve and recover from work stress. During the Year, there was no violation by the Group of any laws and regulations in relation to occupational health and safety, and over the past six years (the Reporting Year inclusive), there was no loss of working days arising from work-related deaths or injuries.

#### 5.3. Remuneration and Benefits

We highly value the contribution of our staff and endeavour to provide remuneration packages which are commensurate with their contribution and conduct regular reviews. The remuneration of the Group's employees is determined primarily on the basis of market rates, qualifications, competence and experience of the employees. The Group has an annual performance appraisal system in place, which enables the management to assess staff performance and remuneration on a regular basis to award their contribution and incentivize them for better performance, allowing them to pursue career within the Group. The performance appraisal system allows employees to share their personal and professional development with the Company, facilitating the Group's understanding on potential of different employees, and in turn collects feedback from employees and optimises future recruitment or training.

In terms of benefits and holidays, the Group has implemented five-day workweek. In addition to the five insurance policies and a housing provident fund as well as statutory holidays stipulated by the Chinese government, we also provide annual leave, bereavement leave, wedding leave, maternity leave and sick leave for our employees. We also provide additional medical coverage for our employees by insuring them upon joining the Company in accordance with the China Medical Plan.

#### 5.4. Training and Development

The talents and efforts of our employees are keys to the success of the Company. We nurture talents by providing diversified learning channels to enhance the professional knowledge and skills of our staff, and keep them abreast of industry information and keep them up to date. We provide all staff with different kinds of training, such as cybersecurity training for IT system, modularisation of mobile APP, the importance of southbound trading and analysis of investment strategy, etc., so that our staff can understand the latest development of the Company's products and industry trends, enriching their technical know-how to keep pace with the market.

We actively provide opportunities for upward mobility of talents, and we will give priority to internal promotions before external recruitment when vacancies exist. In addition, we encourage communication with each other. As such, we have established an intranet function to build a platform for our staff to communicate with the management.

# 6. GREEN OPERATIONS

The Group is fully aware of its corporate responsibility to protect the environment. We have strictly complied with the relevant laws and regulations relating to environmental protection such as the Environmental Protection Law of the PRC (《中 華人民共和國環境保護法》) and the Energy Conservation Law of the PRC (《中華人 民共和國節約能源法》). We have developed a Corporate Environmental Policy (《企 業環境政策》) to encourage our employees to conserve resources in their daily work. We operate our business primarily in our offices and are not subject to specific laws and regulations related to sewage discharge, gas emissions and land contamination. However, we continue to monitor and manage the environmental impacts caused by our business operations and minimise them as much as possible.

During the Reporting Period, the Group had neither violated any laws in relation to environmental protection, nor contributed to any material accidents leading to negative impacts on the environment and natural resources, nor received any punishment and notice of proceedings regarding the environmental scope in relation to the Group.

#### 6.1. Low-carbon Operations

The Group recognises that reducing greenhouse gas ("**GHG**") emissions is the most important means of mitigating climate change and that quantifying our greenhouse gas emissions provides the basis for further reductions. The Group's GHG emissions were mainly from the electricity consumption involved in office operations and we continued to conduct carbon emission calculations with reference to the Greenhouse Gas Protocol (《溫室氣體盤查議定書》) developed by the World Resources Institute and the World Business Council for Sustainable Development, and ISO14064-1 formulated by the International Organization for Standardization. The GHG emission performance for the Group's headquarters in Shenzhen are as follows:

GHG Emission Per	formance	Unit	For the year ended 31 March 2024	For the year ended 31 March 2023
GHG Emissions				
Scope 1	Direct GHG emissions	tonnes of carbon dioxide equivalent (" <b>CO</b> <sub>2</sub> e")	0.0	0.0
Scope 2	Indirect GHG emissions	tonnes of CO <sub>2</sub> e	84.6	89.4
Total amount of GH	G emissions	tonnes of CO <sub>2</sub> e	84.6	89.4
Per employee (Scopes 1 and 2)		tonnes of $CO_2e/m^2$ tonnes of $CO_2e/m^2$	0.05 0.6	0.05 0.6
		employee		

Scope 1: The direct GHG emissions generated from the sources owned and controlled by the Group.

Scope 2: The indirect GHG emissions arising from electricity generation, heating and cooling or the vapour the Group purchased externally.

The calculation of GHG emissions data during the Year has been updated based on the emission factors of electricity issued by the National Development and Reform Commission.

#### 6.2. Response to Climate Change

In view of the increasing number of extreme climate events around the world, we started to focus on climate risk identification and assessment during the Year in order to enhance our resilience to climate change. Through enterprise risk assessment, we have considered the recommendations of the Task Force on Climate-related Financial Disclosures (the "**TCFD**") to fully manage the significant climate change-related risks that may affect us. In addition, we have regularly evaluated the effectiveness of our mitigation measures and areas of improvement, which further strengthened the resilience of our business to the impacts of climate change. The climate change-related risks we have identified are mainly extreme weather risk, chronic physical risk, transition risk and market risk, which pose low to medium impact. The following are the significant climate-related issues identified and the corresponding actions taken to minimise the impact of risks:

Risk level	Climate risks	Actions taken to manage risks
Low	Extreme weather (physical risk) brings typhoons, high temperatures, heavy rains, droughts, which may lead to disruption of platform services in severe weather and may result in temporary closure of office locations	• When the government department issues relevant extreme weather, the Company will implement measures to ensure the safety of employees, such as early release/working from home, depending on the situation.
		<ul> <li>Review the impact of extreme weather on business and develop a "disaster recovery plan" to deal with the emergency.</li> </ul>
		• Back up the data in a timely manner to ensure it can be retrieved.
	Chronic physical risks <sup>1</sup> , such as temperature rise and sea level rise, possibly leading to property damage	<ul> <li>Set carbon emission targets and reduction plans to meet the emission targets stipulated in the Paris Agreement (《巴黎協議》) and contribute to climate change mitigation.</li> </ul>
Medium	Transition risks, such as the introduction of emission reduction regulations where operations are located, which may require the Group to spend additional resources to cope with the regulations	• Pay close attention to regulatory developments related to the environment protection that may affect the business, supply chain and customers of the Company.
	Market risk, such as the Company's failure to meet consumers' green operations expectations	• Prioritise environmentally friendly investment products to support the transition towards a more inclusive, low-carbon economy.

<sup>&</sup>lt;sup>1</sup> Chronic physical risks refer to risks derived from climate change over time (e.g. persistent high temperatures) that could cause sea level rise or persistent hot weather

We are committed to implementing environmentally friendly offices to reduce GHG emissions. On the other hand, we will gradually implement measures to manage climate-related risks, in particular to improve our resilience to climate change and ensure that we can return to normal operations as soon as possible after severe weather. At the same time, we are keen to improve the stability of our trading platform to prevent instability caused by severe weather.

We will continue to regularly assess climate change-related risks and the mechanisms that address such risks in the future, so as to mitigate the impact of climate change on us and make a smooth transition to a low-carbon economy.

#### 6.3. Green Office

As an integrated securities trading platform service provider, the nature of our business does not involve a significant impact on the environment or natural resources. However, we promote the efficient use of resources by our employees to improve the use of resources and energy efficiency and to maintain the long-term sustainability of our business and the communities in which we operate. We also convey the message on environmental protection through media such as e-mail, posters and internal network to enhance environmental awareness for our staff and facilitate the implementation of measures.

#### 6.3.1. Energy Management

The Group promotes safe use of electricity and conservation of electricity and educates its staff on the subject. Most of our energy consumption derives from our uses of lighting, air-conditioning systems and equipment in our offices. In order to reduce electricity consumption and carbon emissions, we have implemented the following measures:

Air- conditioning systems	<ul> <li>Avoid installing air-conditioners in direct sunlight</li> <li>Clean the air filter screens/coil fans regularly to reduce unnecessary energy consumption</li> <li>Turn off air conditioning when not using the office</li> <li>Allow our staff to wear casual outfits in hot weather</li> </ul>
Lighting systems	<ul> <li>Maximise the use of daylight for lighting to reduce power consumption</li> <li>Adopt high-efficiency lighting</li> <li>Install separate switches in meeting rooms to avoid use of lights in the unnecessary lighting zones for a long time</li> <li>Keep lighting fixtures and lamps clean to maximise their energy efficiencies</li> <li>Develop the employees' habit of switching off lights when they are not in use</li> </ul>
Electronic equipment and appliances	<ul> <li>Set the computers to go into automatic standby/ sleep mode when it is idle</li> <li>Train employees to turn off electronic devices completely during non-working hours</li> <li>Consider the energy efficiency performance when purchasing electronic equipment</li> </ul>

The following is the energy consumption of the Group's headquarters in Shenzhen during the Reporting Period:

		For the year ended 31 March	For the year ended 31 March
	Unit	2024	2023
Total electricity consumption	KWh	148,272	156,694
Electricity consump intensity	tion		
Per square metre	kWh/m <sup>2</sup>	83.3	88.0
Per employee	kWh/employee	981.9	1,030.9

#### 6.3.2. Paperless Office

The Group has adopted paperless electronic office systems for daily administrative work. Staff are encouraged to replace paper records with electronic documents and electronic communications, so as to reduce paper usage and document printing. Where document printing is unavoidable, we encourage staff to use small fonts, narrow line spacing and double-sided printing, and reuse or use both sides of scrap paper whenever possible. Printers in our office are also preset to print on both sides of the paper in an ink-saving mode to reduce ink use and paper waste. We also start with procurement of environmentally friendly materials and try to purchase printing paper, toilet paper and paper towels that contain recycled materials.

Paper consumption for the Reporting Period decreased with the paper consumption density per capita decreased by 3.6% during the Year. The following is the paper usage of the Group's headquarters in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2024	For the year ended 31 March 2023
Total paper consumption	kg	135.0	140.0
Paper consumption intensity			
Per employee	kg/employee	0.89	0.92

#### 6.3.3. Water Resources Management

We encourage our staff to conserve water and have implemented multiple measures in this regard, such as posting water conservation signage to remind them to cherish water. When leaking faucet is found, we contact the property management company immediately to arrange maintenance work as soon as possible and reduce unnecessary wastage.

With the effective implementation of different measures, the water consumption intensity per employee have decreased during the Year. The following is the water usage of the Group's headquarters in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2024	For the year ended 31 March 2023
Total water consumption	m <sup>3</sup>	1,044.0	1,073.0
Water consumption intensity			
Per square metre Per employee	m³/m² m³/employee	0.59 6.9	0.60 7.1

#### 6.3.4. Waste Management

The Group promotes "waste reduction at source", "reuse" and "recycling", and strives to reduce waste generation. We assess the usage of materials to avoid overstocking and avoid the use of disposable and non-recyclable products. We also encourage staff to use rechargeable batteries, reuse pen holders, envelopes, document folders, file cards and other office stationeries, and recyclable toner cartridges/ink cartridges.

We placed separate waste recovery bins for collecting paper, metal, plastics and batteries. The collected paper, metal, plastics and batteries will be sent to designated recycling stations for processing.

As a result of the above measures, the non-hazardous waste generation intensity per capita and hazardous waste generation intensity per capita decreased by approximately 5.4% and 6.8% respectively during the Reporting Period as compared with those of the previous year. The following is the data on waste production of the Group's headquarters in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2024	For the year ended 31 March 2023
Total amount of non- hazardous waste produced	kg	1,056	1,120
Total amount of hazardous waste produced	kg	7.4	8.0
Total amount of non- hazardous waste recycled	kg	65.0	59.0
Intensity of waste produced			
Non-hazardous waste produced per employee	kg/employee	7.0	7.4
Hazardous waste produced per employee	g/employee	49.0	52.6

#### 6.3.5. Environmental Targets

Recognising our social responsibility to protect the environment, we set initial directional targets for the Year in terms of energy efficiency, water efficiency, waste reduction and GHG emissions. We will review and examine the progress of our environmental targets and initiatives, and monitor our emissions sources to identify further opportunities for energy savings and emission reductions. In the future, we will set more specific and quantifiable environmental targets to more effectively contribute to the mitigation of climate change by ensuring that resources are used appropriately.

Environmental Scope	Targets <sup>2</sup>
Energy efficiency and GHG emissions <sup>3</sup>	Maintain or gradually reduce electricity consumption by actively implementing the Group's electricity conservation measures
Water efficiency	Maintain or gradually reduce water consumption by actively implementing the Group's water conservation measures
Waste reduction	Maintain or gradually reduce waste generation by actively implementing the Group's resources conservation measures

<sup>&</sup>lt;sup>2</sup> The Group mainly operates its business in office. We will regularly monitor the consumption of resources and the emissions in office and adjust the targets according to the actual consumption and business situation

<sup>&</sup>lt;sup>3</sup> The main source of our GHG emissions was indirect GHG emissions caused by the Group's purchased electricity, and therefore, GHG emissions could be effectively reduced by saving electricity consumption during the Year

# 7. CONTRIBUTION TO THE SOCIETY

While the Group is actively developing its business, we keep supporting various community engagement in order to give back to the society. We will take advantage of our expertise and advantages in the industry to actively collaborate with charities and participate in various community investments and charity activities in the future. We will also continue to foster a sense of social responsibility among our employees and encourage them to participate in voluntary projects and/or community activities on their own initiatives. Looking ahead, we will fully utilise the Group's business strengths to develop community investment plans, invest more resources in charity activities and make more contributions to the community.

## APPENDIX I: SUSTAINABILITY DATA STATEMENTS

Environmental Performance	Unit	For the year ended 31 March 2024
GHG emissions		
Direct GHG emissions (Scope 1)	tonnes of CO <sub>2</sub> e	0.0
Indirect GHG emissions (Scope 2)	tonnes of CO <sub>2</sub> e	84.6
Total GHG emissions (Scope 1 & 2)	tonnes of CO <sub>2</sub> e	84.6
GHG emission intensity (per square metre)	tonnes of CO <sub>2</sub> e/m <sup>2</sup>	0.05
GHG emission intensity (per employee)	tonnes of CO <sub>2</sub> e/ employee	0.6
Energy consumption		
Purchased electricity consumption	kWh	148,272
Purchased electricity consumption	kWh/m²	83.3
intensity (per square metre)		
Purchased electricity consumption	kWh/employee	981.9
intensity (per employee)		
Water consumption		
Total water consumption	m <sup>3</sup>	1,044
Water consumption intensity	m <sup>3</sup> /m <sup>2</sup>	0.59
(per square metre)		
Water consumption intensity	m <sup>3</sup> /employee	6.9
(per employee)		
Paper consumption		
Total paper consumption	kg	135.0
Paper consumption intensity (per employee)	kg/employee	0.89

		For the
Environmental Performance	Unit	year ended 31 March 2024
Waste		
Total non-hazardous waste produced	kg	1,056.0
Intensity of non-hazardous waste produce (per employee)	ed kg/person	7.0
Total non-hazardous waste recycled	kg	65.0
Total hazardous waste produced	kg	7.4
Intensity of hazardous waste produced (per employee)	g/person	49.0
		For the
Social Performance <sup>4</sup>	Unit	year ended 31 March 2024
Total number of employees	Person	151
Number of employees by gender		
Female employees	Person	45
Male employees	Person	106
Number of employees by employment ty	ре	
Short-term contract employees	Person	0
Entry-level employees	Person	118
Middle-level management employees	Person	20
Senior management employees	Person	13
Number of employees by age group		
Employees aged below 30	Person	82
Employees aged 30 to 50	Person	63
Employees aged above 50	Person	6

<sup>4</sup> Disclosure of Social Key Performance Indicators includes group-wide data

		For the year ended
Social Performance⁴	Unit	31 March 2024
Number of employees by geographical region		
Employees from South China	Person	139
Employees from other regions, including Hong Kong, Macau and Taiwan	Person	
Total employee turnover rate⁵		13.7%
Employee turnover rate by gender		
Female employees		6.2%
Male employees		8.5%
Employee turnover rate by age group		
Employees aged below 30		11.7%
Employees aged 30 to 50		2.6%
Employee turnover rate by geographica region	I	
Employees from South China		13.2%
Employees from other regions, including Hong Kong, Macau and Taiwan		0.7%

<sup>&</sup>lt;sup>5</sup> Turnover rate = number of employees lost ÷ (number of employees lost + number of employees at the end of the year) × 100%

Social Performance⁴	Unit	For the year ended 31 March 2024
Percentage of employees trained		100%
Average training hours per employee gender	by	
Female employees	Hour	8.1
Male employees	Hour	8.1
Average training hours per employee employment type	by	
Entry-level employees	Hour	10
Middle-level management employees	Hour	4.5
Senior management employees	Hour	2.5

# APPENDIX II: THE HONG KONG STOCK EXCHANGE ESG REPORTING GUIDE INDEX

#### Index Content

## Related Section(s)

#### A. Environmental Scope

A1	Emissions	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	6. Green Operation
		A1.1	Types of emissions and respective emissions data.	Not applicable, the Group's operations do not involve emissions
		A1.2	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions in total and, where appropriate, intensity.	6.1. Low-carbon Operations Appendix I: Sustainability Data Statements
		A1.3	Total hazardous waste produced and intensity.	6.3.4. Waste Management Appendix I: Sustainability Data Statements
		A1.4	Total non-hazardous waste produced and intensity.	6.3.4. Waste Management Appendix I: Sustainability Data Statements
		A1.5	Description of the emission target(s) set and the steps taken to achieve them.	6.3. Green Office
		A1.6	Description of how hazardous and nonhazardous wastes are handled, and a description of the reduction target(s) set and steps taken to achieve them.	6.3.4. Waste Management 6.3.5. Environmental Targets

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A2	Use of Resources	General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	6.3. Green Office
		A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total and intensity.	6.1. Low-carbon Operations Appendix I: Sustainability Data Statements
		A2.2	Water consumption in total and intensity.	6.3.3. Water Resources Management Appendix I: Sustainability Data Statements
		A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	6.3. Green Office
		A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	<ul><li>6.3.3. Water Resources Management</li><li>6.3.5. Environmental Targets</li><li>The Group's water comes from the municipal water supply and has no problem in obtaining suitable water sources</li></ul>
		A2.5	Total packaging material used for finished products and with reference to per unit produced.	Not applicable, the Group's business is not involved in packaging materials
A3	The Environment and Natural	General Disclosure	Policies on minimising the issuer's significant impacts on the environment and natural resources.	6. Green Operations
	Resources	A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	6. Green Operations
A4	Climate Change	General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	6.2. Response to Climate Change
		A4.1	Description of the significant climate- related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	6.2. Response to Climate Change

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B. B1	Social Scope Employment	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	·
		B1.1	Total workforce by gender, employment type, age group and geographical region.	5.1. Staff Rights Appendix I: Sustainability Data Statements
		B1.2	Employee turnover rate by gender, age group and geographical region.	Appendix I: Sustainability Data Statements
B2	Health and Safety	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer in relation to the provision of safe working environment and protecting employees from occupational hazards.	5.2. Occupational Safety and Health
		B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	5.2. Occupational Safety and Health
		B2.2 B2.3	Lost days due to work injury. Description of occupational health and safety measures adopted, and how they are implemented and monitored.	5.2. Occupational Safety and Health 5.2. Occupational Safety and Health

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B3	Development and Training	General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	5.4. Training and Development
		B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	The percentage of employees trained is 100% and therefore there is no need to disclose the percentage of employees trained by gender and employee category
		B3.2	The average training hours completed per employee by gender and employee category.	Appendix I: Sustainability Data Statements
B4	Labour	General	Information on: (a) the policies; and	5.1. Staff Rights
	Standards	Disclosure	(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	
		B4.1	Description of measures to review employment practices to avoid child and forced labour.	5.1. Staff Rights
		B4.2	Description of steps taken to eliminate such practices when discovered.	5.1. Staff Rights
B5	Supply Chain Management	General Disclosure	Policies on managing environmental and social risks of the supply chain.	4.6. Supply Chain Management
		B5.1	Number of suppliers by geographical region.	4.6. Supply Chain Management
		B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	4.6. Supply Chain Management

Index Content			Related Section(s)
	B5.3	Description of practices to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	4.6. Supply Chain Management
	B5.4	Description of practices to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	4.6. Supply Chain Management
B6 Product Responsibility	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	4. Quality Services
	B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	They are not applicable to the Group's operations
	B6.2	Number of products and service related complaints received and how they are dealt with.	4.5. Customer Services
	B6.3	Description of practices relating to observing and protecting intellectual property rights.	4.3. Intellectual Property Rights
	B6.4	Description of quality assurance process and recall procedures.	4.4. Product Quality With respect to products recall procedures, they are not applicable to the Group's operations
	B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	4.2. Information Security System

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B7	Anti-corruption	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	4.1. Anti-corruption
		B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	4.1. Anti-corruption
		B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.	4.1. Anti-corruption
		B7.3	Description of the anti-corruption training provided to directors and staff.	4.1. Anti-corruption
B8	Community	General	Policies on community engagement	7. Contribution to the Society
	Investment	Disclosure	to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	
		B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	7. Contribution to the Society
		B8.2	Resources contributed to the focus area.	7. Contribution to the Society