WT GROUP HOLDINGS LIMITED
WT 集團控股有限公司

(Incorporated in the Cayman Islands with limited liability)

Stock Code : 8422

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

2024/ 2025



ABOUT THIS REPORT

WT Group Holdings Limited ("**WT Group**" or the "**Group**") is pleased to present the Environmental, Social and Governance ("**ESG**") Report (the "**ESG Report**"). The scope of the ESG Report covers the environmental and social performances of the principal operating activities of the Group in all operating subsidiaries in Hong Kong from 1 July 2024 to 30 June 2025 (the "**Reporting Period**").

The related information in this ESG Report has been prepared in accordance with the Environmental, Social and Governance Reporting Guide (the "**ESG Reporting Guide**") as set out in Appendix C2 to the Rules (the "**GEM Listing Rules**") Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited. Except for provisions that the Group considers are inapplicable to its operation, this ESG Report is compliant with all the "comply or explain" provisions set out in the ESG Reporting Guide.

All business departments of the Group have participated in preparing the ESG Report in order to identify the impacts of the Group on the environment and society and to evaluate its importance to the Group's business and stakeholders. This ESG Report covers the policies of the Group on material ESG issues in relation to the Group's business and compliance.

Reporting Principles

The ESG Report has been prepared based on four reporting principles: materiality, quantitative, balance and consistency.

1. Materiality: The Group reviews and defines the reporting scope based on the significance of different operations. Business units and operations with significant ESG impacts are disclosed in the ESG Report.

2. Quantitative: The Group presents quantitative environmental and social key performance indicators ("**KPIs**") as well as historical data in the ESG Report for comparison where applicable.

3. Balance: This ESG Report must provide an unbiased picture of the ESG performance of the Group. It should avoid selecting, omitting, or presenting formants that may inappropriately influence a decision or judgement by the reader.

4. Consistency: The Group adopts consistent methodologies when preparing the ESG Report and the environmental and social KPIs to allow for meaningful comparisons over time.

Confirmation

As at 30 June 2025, the Group confirmed that it has established appropriate and effective management policies and internal control systems for ESG issues and confirmed that the disclosed contents are in compliance with the requirements of the ESG Reporting Guide.

This ESG Report shall be uploaded and published both in Chinese and English versions on the websites of the Group and the Stock Exchange of Hong Kong Limited at www.hkexnews.hk. In case of any discrepancy between the two versions, the English version shall prevail.

Feedback

The Group welcomes stakeholders to provide their opinions and suggestions. You can provide valuable advice with respect to the ESG Report or the Group's performances in sustainable development at info@waitat-hk.com.

ABOUT THE GROUP

WT Group has principally engaged in the provision of specialised works and general building works as contractor in Hong Kong through its subsidiaries. The Group undertakes specialised works which include foundation and site formation; demolition; and ground investigation field works. The Group also undertakes general building works, including superstructure building, slope maintenance, hoarding, alteration and addition, and other miscellaneous renovation and construction works. The Group contributes to sustainable development by delivering environmental, social and economic benefits to all stakeholders in a balanced way.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE STRATEGIES

The Group has established a sustainable corporate governance structure to ensure that the visions and missions of sustainable development are integrated into the operations. The Group's corporate governance structure stipulates the responsibilities of the departments and subsidiaries, under the supervision of the board (the "**Board**") of directors of the Company (the "**Directors**").

The Board holds ultimate and full responsibility for the Group's sustainability direction, strategy, objectives, performance and reporting. The Board is responsible for evaluating and determining the Group's ESG-related risks and ensuring that appropriate and effective ESG risk management and internal control systems are in place. The Board sets the tone at the top for its ESG strategies and is responsible for ensuring effective risk management and internal controls. The Board reviews and approves the ESG Report annually to ensure it presents a balanced picture of our ESG performance.

To maintain excellent ESG governance, the Group has set up an ESG working taskforce (the "**Taskforce**"), composed of senior management from relevant departments. The Taskforce is required to report ESG-related matters and provide follow-up developments to the Board in a timely manner, such as when ESG performance indicators deviate significantly from pre-set targets, serious or emerging ESG incidents, and changes in regulatory requirements.

The Board delegates authority to the Taskforce for the formulation and execution of ESG policies and measures on an operational level. The Board and the Taskforce review issues and policies related to the Group's sustainable development at least annually, make amendments to the policies and review and approve the ESG Report. The Taskforce is also responsible for defining the ESG targets of the Group and ensuring the Group's operations and practices are carried out in accordance with the ESG policy and targets.

The Group is committed to operating in an economically, socially and environmentally sustainable manner while balancing the interests of diverse stakeholders in order to make a positive impact on the local communities. Setting strategic ESG targets and goals enables the Group to develop a realistic roadmap and focus on results in achieving the visions. The progress of implementation and the performance of the ESG goals and targets should be closely reviewed by the Group from time to time. If the progress falls short of expectations or changes in business operations, it may be necessary to make changes and communicate the goals and targets with key stakeholders. The Group will continue to strive towards achieving these targets.

STAKEHOLDER ENGAGEMENT

The Group values the stakeholders and their feedback regarding the businesses and ESG aspects. To understand and address their key concerns, the Group has maintained close communication with key stakeholders, including but not limited to shareholders and investors, customers and business partners, employees, suppliers and subcontractors, as well as the public. The Group considers stakeholders' expectations in formulating the businesses and ESG strategies by utilising diversified engagement methods and communication channels, as shown below.

Major Stakeholders	Areas of Concern	Communication Channels
Shareholders and Investors	• Financial performance • Corporate transparency • Protection of rights and interests of shareholders	• Annual general meetings and shareholders' meetings • Annual reports, interim reports and quarterly reports • Announcements and circulars • Company website
Customers and Business Partners	• Quality assurance • Project safety • Customer privacy protection	• Company hotline and email • Liaison with the Group's Directors and Project Managers • Progress meetings
Employees	• Career development • Employee training	• Email communication • Training and seminars • Performance appraisals • Regular meetings and activities
Suppliers and Subcontractors	• Fair and open competition • Business ethics • Integrity in cooperation	• Progress meetings • Supplier assessments • Liaison with the Group's Directors and Project Managers
The Public	• Community contribution • Environmental protection	• ESG Report • Company hotline and email • Community investment

MATERIALITY ASSESSMENT

The management and staff of the Group have participated in the preparation of the ESG Report to assist the Group in reviewing the operations and identifying relevant ESG issues. Materiality assessment has been conducted to assess the importance of related matters to the businesses and stakeholders. To identify potential material topics for disclosure in the Report, we adopted the disclosure topics of the ESG Reporting Guide. Based on the assessed significant ESG issues, these issues were discussed among the Board and the Taskforce to evaluate, validate and determine the relevant and material ESG issues of the Group.

The following table is a summary of the Group's ESG issues with high materiality based on their importance to the business operation:

Aspects		Material ESG Issues
A.	**Environmental**	
A1.	Emissions	• Water pollution • Waste management • GHG emissions
A2.	Use of Resources	• Water consumption • Energy consumption
A3.	The Environment and Natural Resources	• Environmental protection measures
A4.	Climate Change	• Climate-related risks and opportunities
B.	**Social**	
B1.	Employment	• Employee welfare • Diversity and equal opportunities • Recruitment, remuneration and promotion
B2.	Health and Safety	• Occupational health and safety • Safe working environment
B3.	Development and Training	• Development and training management
B4.	Labour Standards	• Prevention of child and forced labour
B5.	Supply Chain Management	• Supply chain management • Fair and open procurement • Labour standards in the supply chain
B6.	Product Responsibility	• Project quality control • Protection of intellectual property rights • Protection of customer privacy
B7.	Anti-corruption	• Code of conduct • Anti-corruption and whistle-blowing policy

A. ENVIRONMENTAL ASPECTS

The Group endeavours to minimise any adverse impact on the environment resulting from its business activities. The Group's on-site operations are subject to certain environmental requirements pursuant to the laws and regulations in Hong Kong including but not limited to the Air Pollution Control Ordinance (Chapter 311 of the Laws of Hong Kong), Noise Control Ordinance (Chapter 400 of the Laws of Hong Kong), Water Pollution Control Ordinance (Chapter 358 of the Laws of Hong Kong) and Waste Disposal Ordinance (Chapter 354 of the Laws of Hong Kong). The Group also endeavours to meet the requirements of certain industry's codes of practice, such as the BEAM Plus New Buildings issued by the Hong Kong Green Building Council and the BEAM Society.

Apart from following the environmental protection policies required by the customers, the Group has also established the environmental management policy to ensure proper management of environmental protection and compliance with environmental laws and regulations by both the employees and workers of the subcontractors on air pollution, noise control and waste disposal. Specifically, the Group adopts the following measures to ensure proper management of environmental protection and compliance with environmental laws and regulations during the project execution:

- The Group prepares an environmental management plan for the construction projects. An environmental management plan typically sets out the environmental protection measures, such as noise reduction, air pollution control, water pollution control and waste management;

- The environmental officer of the Group is responsible for monitoring the ongoing compliance with the environmental management plan and providing advice to the Executive Directors of the Group on mitigating the impacts on the environmental protection issues, including noise abatement, air pollution control, water pollution control and waste management that are identified during daily inspection. The environmental officer is also responsible for providing environmental training for on-site workers and subcontractors which are also required to strictly comply with the environmental management plan; and

- The Group is required to report to the customers on the effectiveness of the implementation of the environmental management plan on a monthly basis. The environmental officer assists the environmental manager in compiling monthly environmental reports for submission to customers.

The Group also endeavours to efficiently use resources, including energy and water resources, and minimises its operation impacts on the environment and natural resources. Policies encouraging the efficient use of resources and adopting an eco-friendly approach are emphasized in the Group. The Group also requires subcontractors to uphold the eco-friendly approach.

During the Reporting Period, the Group has not identified any non-compliance or breach of laws and regulations that had a significant impact on the Group relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous wastes, including but not limited to the Air Pollution Control Ordinance (Chapter 311 of the Laws of Hong Kong), Noise Control Ordinance (Chapter 400 of the Laws of Hong Kong), Water Pollution Control Ordinance (Chapter 358 of the Laws of Hong Kong) and Waste Disposal Ordinance (Chapter 354 of the Laws of Hong Kong).

A1. Emissions

The Group has identified the following types of emissions in the ordinary course of the business.

Air and Greenhouse Gas Emissions

The major air pollutants generated from the construction work are the dust, diesel oil and electricity purchased from the machinery used in the construction sites. The Group applies water sprays and uses canvas in its construction sites to reduce air pollution from dust emissions. To reduce air pollution from machinery used in the construction sites, the site project managers of the Group are required to:

- Ensure switching off the engine of the machinery whenever they are in the idle position;
- Recommend the subcontractors to select the most energy-efficient equipment and machinery for production; and
- Check with the subcontractors that regular and proper maintenance services have been performed on the machinery for their environmental performance and efficient use of diesel oil and electricity.

The Group ensures compliance with the emission standard prescribed under the Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation (Chapter 311Z of the Laws of Hong Kong).

The greenhouse gas emissions are mainly contributed by the consumption of diesel oil for powering the generator directly (Scope 1 emissions) and the use of electricity indirectly (Scope 2 emissions). Other indirect emissions (Scope 3) cover the electricity used for fresh water processing and sewage treatment and methane gas generation at landfills in Hong Kong due to disposal of paper waste. Due to the completion of the projects and the closure of the construction site, the greenhouse gas emissions generated during the Reporting Period were mainly contributed indirectly by the use of electricity in the office. The Group will include the data of other relevant greenhouse gas emissions when available. To address climate change, the Group targets to maintain the greenhouse gas emissions intensity in scope 1 and 2 emissions in 2027/28 with baseline year of 2021/22. The summary of greenhouse gas emissions and their intensity are as follows:

Greenhouse gas emissions	**2024/25**	2023/24	**Unit**
Scope 1 emissions	**–**	–	Tonnes CO_2-e
Scope 2 emissions	**3.2**	3.5	Tonnes CO_2-e
Scope 3 emissions	**–**	–	Tonnes CO_2-e
Total greenhouse gas emissions	**3.2**	3.5	Tonnes CO_2-e
Intensity (by no. of employee)	**0.1**	0.1	Tonnes CO_2-e/employee

Hazardous and Non-hazardous Wastes

The Group believes that its business does not generate any material amount of hazardous waste during the construction processes. In case there are hazardous wastes or harmful chemicals produced during the operation, we will outsource the specialist to handle the chemical waste and fence out for careful handling.

Due to the business nature of the Group, certain construction waste is generated in the construction process. The construction waste is disposed of at landfills regularly to avoid excessive accumulation causing a nuisance to the neighbourhood.

Apart from the construction wastes, the Group's non-hazardous wastes also come from the office operation, such as paper. To minimise waste generation, the Group encourages using double-sided printing or photocopying wherever possible and utilising electronic media for communication. The Group also promotes waste recycling by putting adequate recycling facilities in place to facilitate the collection and segregation of waste. Through implementing such measures, employees' awareness of paper consumption reduction and proper recycling has been enhanced.

As the Group did not generate a large amount of non-hazardous waste due to the completion of the projects during the Reporting Period, the Group proposes a new target to maintain the intensity of non-hazardous waste using the base year of 2021/22 as a reference point. The Group will disclose relevant data when available.

To achieve this target, we will implement a comprehensive waste reduction strategy that encompasses various initiatives, including enhanced waste segregation, recycling programs, and responsible waste disposal practices. We will collaborate closely with our stakeholders and supply chain partners to promote waste reduction and implement innovative solutions that contribute to a circular economy.

Water Pollution

In order to effectively manage water pollution, before the commencement of construction works, the project managers need to identify wastewater discharge points in advance. Adequate discharge pipelines and sedimentation tanks will be installed to allow discharging of sewage properly. The Group puts emphasis on treating wastewater properly before discharge. Clarifloc, which is a type of wastewater treatment chemical, was applied to reduce the environmental impacts of wastewater.

A2. Use of Resources

The main resources used by the Group in the construction process are electricity, water and diesel oil. In order to be an environmentally responsible corporation, the Group has implemented environmental management policy and internal principles to minimise wastage and avoid excessive usage of the resources. Environmental protection training is provided for every new and existing employee to understand the industry standards and the internal requirements of the Group on environmental protection.

The Group carries out the construction works in an environmentally friendly manner in which construction methodologies with less energy and material consumption would be adopted. Renewable and recyclable materials would also be used when applicable.

Paper Conservation

The Group is committed to paper conservation and has implemented several measures to reduce paper usage. One of the key strategies is the utilization of email and computers for document reviews, minimizing the need for printed hard copies. By embracing digital platforms, the Group not only saves paper but also increases efficiency in document management. Furthermore, the Group encourages the use of electronic file transfer, mailing, and filing systems, further reducing the reliance on physical paper-based processes. Additionally, they have adopted double-sided printing or photocopying whenever feasible, maximizing the utilization of each sheet of paper. This simple practice significantly reduces paper consumption. Lastly, they actively promote the use of recycled paper, supporting the recycling industry and minimizing the environmental impact of paper production. These comprehensive efforts reflect the Group's commitment to sustainable practices and responsible resource management.

Energy Consumption

The energy consumption by the Group was mainly attributed to the use of diesel for direct energy consumption and the purchased electricity of the Group for indirect energy consumption. During the Reporting Period, the Group only consumed electricity for supporting the office operation. With the energy reduction measures below, the Group has initiated a target of maintaining energy intensity by 2027/28, compared with the baseline year of 2021/22.

The Group has implemented practical measures to reduce energy consumption and promote energy efficiency. One of the key practices is the habit of turning off lights, air-conditioners, and computers when they are not in use, effectively minimizing unnecessary energy usage. The Group prioritizes the use of air-conditioners set at a pre-set room temperature of 25°C, ensuring a comfortable working environment while optimizing energy efficiency. In line with its commitment to sustainability, the Group purchases electrical appliances that have the highest energy efficiency rating, typically labelled as Level 1 on the Energy Label. The Group conducts regular maintenance and repair works on office equipment to improve durability and ensure optimal functionality. These measures collectively demonstrate the Group's dedication to reducing energy consumption.

Water Consumption

We strictly comply with the Water Pollution Control Ordinance (Chapter 358 of the Laws of Hong Kong) and its subsidiary regulations to minimize water usage. Due to the Group's operating locations, it does not encounter any significant issues in sourcing water that is fit for purpose. During the Reporting Period, the water consumption of the Group is minimal in office and was included in the management fee. Therefore, the figures were not available for calculation. The Group will disclose relevant data when available.

Apart from the abovementioned measures in the section headed "A1. Emissions", the Group would reuse the construction wastewater for equipment cleaning after being treated by the sewage treatment tank. This helps to reduce water consumption. The Group aims at maintaining the water intensity in our operations by 2027/28 with the 2021/22 baseline.

The Project Managers are required to set accurate measures to reduce water consumption and water quality impacts from various construction activities, such as construction site runoff, sewage from the workforce, and accidental spillage of chemicals and wastewater. The water consumption heavily depends on the number of construction projects and the condition of each site during the Reporting Period.

Use of Packaging Materials

The use of packaging materials is not a material topic of the Group's operation. Given our business nature, the Group does not have manufacturing facilities and does not consume a significant amount of packaging materials.

The summary of resources consumed and their intensities is as follows:

Direct and/or indirect energy consumption by type	**2024/25**	2023/24	**Unit**
Direct energy consumption	**–**	–	GJ
Indirect energy consumption	**9.5**	10.3	MWh
Total energy consumption	**9.5**	10.3	MWh-e
Intensity (by no. of employee)	**0.4**	0.4	MWh-e/employee

A3. The Environment and Natural Resources

The Group is highly concerned about the impacts of its business on the environment and natural resources. When the Group carries out the construction projects, it would produce adverse impacts to the environment and the need to use natural resources. Apart from the emissions mentioned in the section headed "A1. Emissions" above, the Group also produces noise pollution. In addition to compliance with the relevant environmental regulations and international standards for conducting appropriate protection of the natural environment, the Group has also incorporated the concept of environmental protection into the internal management and project implementation process. The following are the additional measures of the Group to achieve environmental protection:

- Reduction of bottled water usage: encourage employees to monitor water usage and use reusable cups to reduce the use of plastic bottles.

- Noise control: project managers to ensure compliance with the Noise Control Ordinance (Chapter 400 of the Laws of Hong Kong) and adjust site working hours according to the relevant regulations and laws and requests from the customers and use the sound reduction fabric in the construction sites. Regular noise level surveys of respective areas or activities suspected of generating excessive noise levels will be conducted using a calibrated industrial-grade noise level meter.

In summary, the Group has not identified any material non-compliance with the applicable local rules and regulations relating to the environmental aspect and the Group has obtained ISO 14001:2015 in respect of its environmental management system during the Reporting Period.

A4. Climate Change

The Group recognizes both the risks and opportunities that climate change brings. The Group performs the risk analysis to assess the positive and negative consequences and the likelihood of whether those consequences will occur. Management of climate-related risks is incorporated into our broader enterprise risk management framework. The Group will provide guidelines and resources for staff to identify and mitigate significant climate-related issues which have impacted the Group.

The Group has principally engaged in the provision of specialised works and general building works as a main contractor in Hong Kong. Climate change is having effects on worker safety, weather delays, construction materials design and insurance costs in the construction industry. Physical risks, like high temperatures, heavy rain and other extreme weather conditions, may affect the Group's operation and the execution of the construction projects negatively.

Therefore, the Group always endeavours to reduce the emission of greenhouse gases, non-hazardous wastes and resource consumption in order to manage climate-related issues. The Group also provides guidelines to the staff to meet the challenges of climate-related issues. Proper resting areas and sufficient water or drinks are provided to the employees and the subcontractors in the construction sites to avoid heatstroke in hot weather. The Group also encourages our suppliers and subcontractors to adopt appropriate standard operating procedures and checklists to minimise the risks from extreme weather events.

B. SOCIAL ASPECTS

Employment and Labour Practices

B1. Employment

The Group is committed to creating an environment with diversity and equal opportunity. All eligible job applications, internal transfers and promotions are regardless of factors, such as gender, marital status, disability, age, race, family status, sexual orientation, nationality and religion, so as to ensure equal opportunities and fair treatment for all employees and job applicants.

The Group remunerates the employees based on their positions, qualifications and performances. On top of the basic salaries, bonuses may be paid with reference to the Group's performance as well as the employee's performance. An annual salary review will be held by the end of the calendar year. Each department will complete the appraisal report and discuss it with employees. Various types of training are provided to the employees for the enhancement of their knowledge and skills. The Group also assesses the available human resources on a continuous basis and will determine whether additional personnel is required to cope with the business development. The Group strictly prohibits any kind of unfair or unreasonable dismissals.

The Group recognises the importance of maintaining close and open communication with the employees. Employees are encouraged to exchange information, ideas, and views about mutual interests and concerns through formal and informal channels. The Group has established various communication channels with the employees, including setting up mailbox for recommendation and performance review meetings. The Group spares no effort to create a harmonious working environment for their employees.

The Group's employment policy is structured to comply with the local laws and regulations, such as the Employment Ordinance (Chapter 57 of the Laws of Hong Kong), Employees' Compensation Ordinance (Chapter 282 of the Laws of Hong Kong), Mandatory Provident Fund Scheme Ordinance (Chapter 485 of the Laws of Hong Kong), Minimum Wage Ordinance (Chapter 608 of the Laws of Hong Kong) and other regulations in the jurisdictions where we operate. The Group also targets to provide a friendly, comfortable and decent working environment and career growth opportunities to its staff. During the Reporting Period, the Group was not aware of any material non-compliance with laws and regulations in respect of employment mentioned above.

As at 30 June 2025, the Group employed a total of 25 employees, out of which 22 are full time employees and 3 are part time employees. All are based in Hong Kong. The summary of employee-related statistics during the Reporting Period was as follows:

Total workforce		**2024/25**	2023/24	**Unit**
Total number of employees		**25**	25	Employee
By gender	Male	**17**	17	Employee
	Female	**8**	8	Employee
By employment type	Full-time	**22**	22	Employee
	Part-time	**3**	3	Employee
By age group	Below 40 years old	**11**	11	Employee
	40-59 years old	**10**	10	Employee
	60 years old or above	**4**	4	Employee
By employee level	Senior management	**15**	15	Employee
	General employees	**10**	10	Employee
By function	Executive	**10**	10	Employee
	Technical	**8**	8	Employee
	Administrative	**7**	7	Employee
By geographical region	Hong Kong	**25**	25	Employee

Employee turnover rate		**2024/25**	2023/24	**Unit**
Total employee turnover rate		**0**	4	%
By gender	Male	**0**	6	%
	Female	**0**	0	%
By employment type	Full-time	**0**	5	%
	Part-time	**0**	0	%
By age group	Below 40 years old	**0**	9	%
	40-59 years old	**0**	0	%
	60 years old or above	**0**	0	%
By geographical region	Hong Kong	**0**	4	%

B2. Health and Safety

The Group places emphasis on occupational health and work safety during the delivery of the services as it is the Group's commitment not to put employees, subcontractors and the general public in hazards. The Group has implemented occupational health and safety measures as required by relevant occupational health and safety laws, rules and regulations under the supervision of the Executive Directors.

To provide a safe and healthy working environment for the employees and subcontractors and to ensure compliance with the applicable laws and regulations in Hong Kong, the Group implements the "Safety Control Policy" at the commencement and during the implementation period of each project.

The "Safety Control Policy" is documented in writing and supplemented with instructions, training and demonstrations. The Group requires strict implementation of and adherence to the "Safety Control Policy". The Group will continue to put adequate resources and effort into upholding and enhancing safety management in order to reduce the risks related to safety issues. It sets out work safety measures to prevent common accidents which could happen at sites. Some details of the safety plan are set out below:

- The Site Safety Committee, consisting of the External Safety Officer, Safety Supervisor, Project Manager and Foremen, shall visit the sites regularly to assist the Executive Directors to:
  - establish, approve and ensure implementation of the safety plan and review the safety plan on an annual basis;
  - arrange meetings to review the effectiveness of safety measures taken;
  - discuss and countersign the monthly reports submitted by the Safety Officer;
  - carry out surveys and inspections to ensure that all relevant laws are being observed;
  - arrange safety training and talks for all levels of employees and promote awareness of accident prevention; and
  - ensure that all newcomers to the construction sites are aware of their safety obligations;
- All workers are required to hold a valid construction industry safety training certificate and construction workers registration card before they enter the site;
- All new site personnel will undergo initial induction training including core topics, such as safety policy, safety knowledge and practice, safety for fire and lifting, personal protective equipment, emergency, and accident reporting. Workers will receive toolbox talks conducted by the Safety Supervisor and/or External Safety Officer regularly; and
- Safety walk was conducted by the Safety Supervisor, External Safety Officer, Site Foreman and the relevant sub-contractor's representatives to assess general compliance with safety requirements from time to time.

For projects that the Group acts as the main contractor, when there is an accident at the works site, the Group follows the general procedures as below to ensure proper recording and handling of work injuries:

- **Fact-finding and follow-up actions**
  The External Safety Officer and/or Safety Supervisor will investigate the accident by visiting the accident scene, examining the equipment and/or material involved and taking statements from the injured worker, witness(es) of the accident and other personnel in relation to the project.

  Remedial actions will be taken by the project management team to remove the imminent danger and prevent similar accidents in the future. The External Safety Officer will also carry out a follow-up inspection to ensure that remedial works are implemented.

- **Reporting**
  The Project Manager, External Safety Officer and/or Safety Supervisor will prepare a work injury report and submit it to the Labour Department within the period as specified under the relevant laws and regulations.

  The administrative department will report to the insurance company. When the claim is significant, they will consult external legal advisors if necessary.

- **Settlement or litigation**
  Settlement of any claim will be handled by the insurance company. If the insurance company and the injured person (or their respective representatives) do not agree on the settlement amount, the matter may be litigated.

The Group has taken out insurance in compliance with applicable laws and regulations with a view to providing sufficient coverage for any work-related injuries for employees.

During the preceding three years and the Reporting Period, the Group has not encountered any fatal construction accident on construction sites and did not identify any non-compliance to the relevant laws, rules and regulations relating to safety and health, including but not limited to the Occupational Safety and Health Ordinance (Chapter 509 of the Laws of Hong Kong), Employees' Compensation Ordinance (Chapter 282 of the Laws of Hong Kong) and other applicable laws and regulations. During the Reporting Period, 0 cases of work-related injuries were reported and the number of lost days due to work injuries was 0 days. The Directors are of the view that the safety management system is adequate and the Group has obtained OHSAS 18001:2007 in respect of the safety and health management system.

Health and Safety	**2024/25**	2023/24	**Unit**
Number of work-related fatalities	**0**	0	No.
Rate of work-related fatalities	**0**	0	%
Lost days due to work injury	**0**	0	Day

B3. Development and Training

The Group believes that continuous education and training are important to maintain the service quality, so the Group uses the best effort to train and retain appropriate and suitable personnel. New employees are required to receive induction training to familiarise themselves with the applicable rules and regulations and the requirements of their jobs before they start their work. The Group also provides health and safety-related training to all staff. The Group also encourages relevant personnel to attend training courses to keep them up to date with the latest developments and best practices in the industry to enhance their work performance.

Training and development resources are reviewed regularly for their sufficiency and adequacy to ensure a competent workforce for delivering high-quality services in meeting customers' needs. The representative in the Human Resources Department will actively look for the applicable external training programme for the team to maintain our competence. During the Reporting Period, employees were sponsored to study the "First Aid and CPR Certificate Course" to equip them with suitable skills.

Percentage of trained employees		**2024/25**	2023/24	**Unit**
Percentage of total employees trained		**60**	52	%
By gender	Male	**59**	59	%
	Female	**63**	38	%
By employee level	Senior management	**73**	73	%
	General employees	**40**	20	%
By function	Executive	**80**	80	%
	Technical	**50**	50	%
	Administrative	**43**	14	%

Average training hours completed		**2024/25**	2023/24	**Unit**
Average training hours per employee		**10.0**	6.0	Hour/employee
By gender	Male	**9.0**	5.3	Hour/employee
	Female	**10.0**	7.5	Hour/employee
By employee level	Senior management	**9.1**	5.3	Hour/employee
	General employees	**12.5**	7.0	Hour/employee
By function	Executive	**8.8**	7.5	Hour/employee
	Technical	**11.3**	5.0	Hour/employee
	Administrative	**11.7**	5.0	Hour/employee

B4. Labour Standards

The Group strictly complies with the relevant requirements of the labour laws. All job applicants must conform to the age requirement specified by local laws. The Group forbids the recruitment of child labour and forced labour, for which a procedure of selection and recruitment is adopted. The Group also takes practicable steps to comply with the labour laws:

- The Group's human resources and administrative officers inspect and take a copy of the original Hong Kong identity card and/or other documentary evidence showing that he/she is lawfully employable in Hong Kong;
- The Group's subcontractors are required to hire only persons who are lawfully employable to work on-site and to prevent any illegal worker from entering the site;
- The Group's foremen are responsible for inspecting the personal identification document of each worker and shall refuse any person who does not possess a proper personal identification document from entering the site; and
- Employment of persons under 18 years old on construction sites is prohibited.

With the application of the above steps, the Group can prevent the possibility of discovering child or forced labour. Should any case of child labour or forced labour be reported or discovered within our operations or supply chain, employment with all these candidates will be immediately terminated. The Group would also take responsibility for the investigation.

During the Reporting Period, the Group has not identified any non-compliance with child and forced labour-related laws and regulations, including but not limited to the Employment Ordinance (Chapter 57 of the Laws of Hong Kong) and regulations in the jurisdictions where we operate.

Operating Practices and Social Investment

B5. Supply Chain Management

The Group purchases construction materials and other miscellaneous goods from suppliers and engages subcontractors to perform the construction works. Supply chain management is a key component in the quality control system of the Group so strict controls are implemented to ensure its effectiveness and efficiency.

The Group maintains an internal list of approved subcontractors and suppliers which is updated on a continuous basis. The internal list is reviewed annually by the Group's project manager and approved by the Executive Director. All subcontractors and suppliers are located in Hong Kong. While engaging a sub-contractor, the Group generally selects the most suitable sub-contractor from the approved list based on its relevant skill sets, experiences, availability and fee quotations. With regard to construction materials, unless the customers require the Group to order from designated suppliers, the Group generally procures materials from the internal list, which the Group has maintained a satisfactory business relationship with the approved suppliers and the products provided are of good quality. The Group generally procures from multiple suppliers and subcontractors for products and services to avoid over-reliance on a few suppliers and subcontractors.

In order to identify environmental and social risks along the supply chain, the Group's Project Manager, on-site Foreman and Environmental Officer monitor the construction progress and methodologies used. They also inspect the materials delivered on-site, ensuring that they comply with relevant regulations, standards and qualities. We collaborate with them to ensure compliance with environmental regulations and best practices. During the process of assessing tenders from the subcontractors, the Group also evaluates and reviews the safety history of the subcontractors for reference.

The Group emphasizes fair and open procurement. The Group will strictly monitor the staff and personnel to prevent any business bribery. Employees or personnel having any interest relationship with the supplier should not be involved in the related business activities.

During the Reporting Period, the Group worked closely with 220 subcontractors and/or suppliers in Hong Kong. The Group's environmental officer provided training to them and inspected their products to ensure the quality of products and services. The Group also requires the subcontractors to uphold the eco-friendly approach in the construction process and strengthen monitoring of environmental issues. Suppliers are required to comply with the relevant environmental and social national labour policies and legislation, which include the prevention of slavery, forced and bonded labour, child labour and abusive employment practices.

During the Reporting Period, the Group had no material shortage of the construction materials and did not experience any material shortage or delay in the supply of materials or services from the subcontractors. The Group has also obtained ISO 9001:2015 in respect of the Group's quality control on daily operations.

Supply Chain Management		**2024/25**	2023/24	**Unit**
Number of suppliers by geographical region				
Total number of Subcontractors/ suppliers		**220**	220	Number
By geographical region	Hong Kong	**220**	220	Number

B6. Product Responsibility

Project Quality Control

The Group believes that the quality of the work and reputation are crucial to winning future tenders and securing future business opportunities. As such, the Group places a strong emphasis on quality control of the work to ensure that the work meets or exceeds the required standards. The Group has also obtained ISO 9001:2015 in respect of the Group's quality control.

For quality assurance, the project management team holds regular meetings with the customers and the subcontractors to review the progress of the projects and to resolve any problems which may arise. Daily progress reports, contractor reports and site photos are submitted to the customers during such meetings if required. As mentioned in the section headed "B5. Supply Chain Management", the Group procures products and services only from the approved suppliers or subcontractors which would be reviewed and approved annually. The materials delivered on-site would also be inspected by the Group's employees to ensure that they are of good quality. Upon completion of the work, various tests will be performed to confirm that the specified standards have been met and a practical completion certificate will be issued by the architects.

Complaint Management

The Group prioritizes transparent and effective complaint management as part of our commitment to ESG practices. Our complaint management system is designed to ensure timely and fair resolution of grievances while promoting continuous improvement. Our project management team works closely with relevant departments to address complaints, identify root causes and implement appropriate corrective actions. The Group has not identified any significant complaints relating to the construction services provided during the Reporting Period.

Protection of Intellectual Property Rights

The Group is devoted to protecting intellectual property rights. Any product or design work (either finished or in progress) made by the employee under the employment period shall belong to and be the absolute property of the Group.

Protection of Data Privacy

The Group emphasizes the importance of data privacy. It strives to protect the privacy of its customers, business partners and staff in the collection, processing and use of their business or personal data. Any information related to customers or suppliers, including contact, quotation or working terms, should be kept confidential. The Group observes the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the "**PDPO**") and the data collection principles under the PDPO in conducting our business.

The Group has not identified any material non-compliance with relevant laws and regulations in Hong Kong relating to health and safety, advertising and labelling matters relating to products and services provided and methods of redress that would have a significant impact on the Group during the Reporting Period, including but not limited to the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong), Trade Marks Ordinance (Chapter 559 of the Laws of Hong Kong), Patents Ordinance (Chapter 514 of the Laws of Hong Kong) and Copyright Ordinance (Chapter 528 of the Laws of Hong Kong).

Product Responsibility	**2024/25**	2023/24	**Unit**
Percentage of total products sold or shipped subject to recalls	**0**	0	%
Number of products and service-related complaints received	**0**	0	No.

B7. Anti-Corruption

The Group believes that honesty, integrity and fairness are of vital importance to its business operations. All employees are required to comply with the Group's code of conduct which stipulated the Group's internal anti-bribery and corruption guidelines.

The Group set up the "Code of Ethics and Conducts" to prevent Money Laundering. Employees must comply with any procedures required by local legislation to prevent money obtained through illegal means from entering the legitimate economy. In case there is any suspicion about the source of money, Employees should immediately report to the Chief Financial Officer and have it checked and investigated.

The Group has also established a whistle-blowing policy for the employees to report any misconduct. Effective internal controls for different business processes have also been implemented by the Group to prevent and detect fraudulent activities. The Group also delegates whistleblowing committee and audit committee to investigate all concerns of malpractice relating to the Group. Necessary investigation or further actions should be reported to the Board or governmental enforcement departments if the malpractice may account for a criminal offence.

All matters raised by the whistle-blowers will be kept strictly confidential. The Group will take all reasonable steps to ensure that whistle-blowers will be protected from any reprisals by any employee of the Group.

Special training on anti-corruption was conducted by the ICAC trainers to understand business ethics and corruption prevention. During the Reporting Period, the ISO Manager delivers internal briefings regarding the corporate governance policies to our staff regularly in order to increase awareness in the workplace and avoid corruption practices.

During the Reporting Period, the Group did not violate any laws and regulations that had a significant impact on the Group relating to corruption, bribery, extortion, fraud and money laundering, which includes but not limited to the Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong). The Board has also assessed the internal control policy and reviewed certain payment records and is not aware of any matters that should be brought to their attention or the Shareholders.

Anti-Corruption	**2024/25**	2023/24	**Unit**
Number of concluded legal cases regarding corruption	**0**	0	Case

B8. Community Investment

The Group emphasizes the importance of corporate social responsibilities. Apart from commercial activities, the Group encourages its management and staff to participate in community services. In the meantime, it also motivates staff to actively participate in public welfare activities, such as charitable donations and volunteer visits, to contribute to society in multiple aspects. During the Reporting Period, the Group has not made any charitable donation. The Group will consider from time to time to donate to charitable organisations when the Group identifies the suitable non-profit-marking organisation and has sufficient financial resources.

HKEX ESG REPORTING GUIDE CONTENT INDEX

KPIs		Disclosure Requirements	Sections
1	Governance Structure	disclosure of the board's oversight of ESG issues;	ESG Strategies
		board's ESG management approach and strategy, including the process used to evaluate, prioritise and manage material ESG-related issues (including risks to the issuer's businesses);	ESG Strategies
		how the board reviews progress made against ESG-related goals and targets with an explanation of how they relate to the issuer's businesses.	ESG Strategies
	Reporting Principles	Description of, or an explanation on, the application of the following Reporting Principles (Materiality, Quantitative, Consistency) in the preparation of the ESG report.	About This Report
	Reporting Boundary	A narrative explaining the reporting boundaries of the ESG report and describing the process used to identify which entities or operations are included in the ESG report. If there is a change in the scope, the issuer should explain the difference and reason for the change.	About This Report
	Environmental		
	Aspect A1: Emissions		
A1	General Disclosure	Information on:	
		(a) the policies; and	Emissions
		(b) compliance with relevant laws and regulations that have a significant impact on the issuer	Emissions
		relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	
A1.1		The types of emissions and respective emissions data.	Emissions
A1.2		Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Emissions
A1.3		Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Hazardous and Non-Hazardous Waste
A1.4		Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Hazardous and Non-Hazardous Waste
A1.5		Description of emissions target(s) set and steps taken to achieve them.	Emissions
A1.6		Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Hazardous and Non-Hazardous Waste
A2	Use of Resource		
A2	General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	Energy Consumption

KPIs		Disclosure Requirements	Sections
A2.1		Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	Energy Consumption
A2.2		Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Water Consumption
A2.3		Description of energy use efficiency target(s) set and steps taken to achieve them.	Energy Consumption
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.	Water Consumption
A2.5		Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Use of Packaging Materials
A3	The Environment and Natural Resources		
A3	General Disclosure	Policies on minimising the issuer's significant impacts on the environment and natural resources.	The Environment and Natural Resources
A3.1		Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	The Environment and Natural Resources
A4	Climate Change		
A4	General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	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.	Climate Change
Social			
B1	Employment		
B1	General Disclosure	Information on: (a) the policies; and	Employment and Labour Practices
		(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.	Employment and Labour Practices
B1.1		Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	Employment and Labour Practices
B1.2		Employee turnover rate by gender, age group and geographical region.	Employment and Labour Practices
B2	Health and Safety		
B2	General Disclosure	Policies	Health and Safety

KPIs		Disclosure Requirements	Sections
		compliance with relevant laws and regulations that have a significant impact on the issuer.	Health and Safety
B2.1		Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	Health and Safety
B2.2		Lost days due to work injury.	Health and Safety
B2.3		Description of occupational health and safety measures adopted, and how they are implemented and monitored.	Health and Safety
B3	Development and Training		
B3	General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Development and Training
B3.1		The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Development and Training
B3.2		The average training hours completed per employee by gender and employee category.	Development and Training
B4	Labour standards		
B4	General Disclosure	Policies	Labour Standards
		compliance with relevant laws and regulations that have a significant impact on the issuer.	Labour Standards
B4.1		Description of measures to review employment practices to avoid child and forced labour.	Labour Standards
B4.2		Description of steps taken to eliminate such practices when discovered.	Labour Standards
B5	Supply chain management		
B5	General Disclosure	Policies on managing environmental and social risks of the supply chain.	Supply Chain Management
B5.1		Number of suppliers by geographical region.	Supply Chain Management
B5.2		Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	Supply Chain Management
B5.3		Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Supply Chain Management
B5.4		Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Supply Chain Management
B6	Product Responsibility		
B6	General Disclosure	Policies	Product Responsibility
		compliance with relevant laws and regulations that have a significant impact on the issuer	Product Responsibility

KPIs		Disclosure Requirements	Sections
B6.1		Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Product Responsibility
B6.2		Number of products and service related complaints received and how they are dealt with.	Product Responsibility
B6.3		Description of practices relating to observing and protecting intellectual property rights.	Product Responsibility
B6.4		Description of quality assurance process and recall procedures.	Product Responsibility
B6.5		Description of consumer data protection and privacy policies, and how they are implemented and monitored.	Product Responsibility
B7	Anti-corruption		
B7	General Disclosure	Policies compliance with relevant laws and regulations that have a significant impact on the issuer.	Anti-corruption 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.	Anti-Corruption
B7.2		Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	Anti-Corruption
B7.3		Description of anti-corruption training provided to directors and staff.	Anti-Corruption
B8	Community investment		
B8	General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Community Investment
B8.1		Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	Community Investment
B8.2		Resources contributed (e.g. money or time) to the focus area.	Community Investment