



COME SURE

Group (Holdings) Limited

(Incorporated in the Cayman Islands with limited liability) Stock Code: 00794



2018

ENVIRONMENTAL, SOCIAL
AND GOVERNANCE REPORT

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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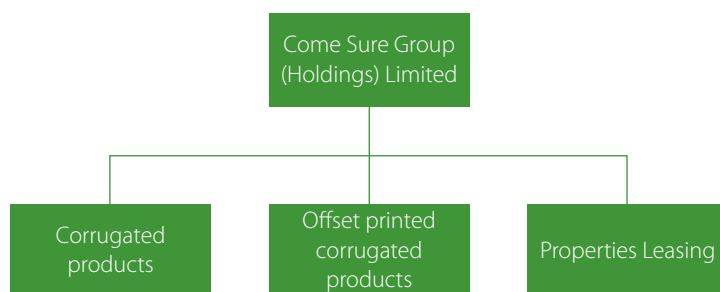
About the Group

Come Sure Group (Holdings) Limited ("Come Sure" or "the Group") has about 30 years of experience in manufacturing and sales of corrugated paperboards and paper packaging products. The variety of our products includes corrugated cartons, corrugated paperboards, and offset printed packaging products and instruction manuals. The Group has established long-term relationships with over 250 domestic and overseas customers of different industries, such as electronic appliances, food and beverage, furniture, pharmaceutical and audio-visual products.

Come Sure Group was one of the PRC Top 50 Enterprises for Printed Cartons in the Paper Packaging Industry from 2010 to 2016, Top 100 Printing Enterprises in the PRC for 15 consecutive years from 2003 to 2017, the PRC Top 50 Enterprises in the Paper Packaging Industry in 2017 and was awarded Hong Kong Outstanding Enterprises for 5 consecutive years from 2010 to 2014 by The Economic Digest.

The production bases of the Group are located in Shenzhen, Huizhou and Fujian, Guangdong. The demand for corrugated paper packaging products has increased significantly due to the rapid expansion of E-commerce and increased domestic consumption capacity. Guangdong business remains the main focus of the Group, and the development of the Fujian plant will further enhance the production capacity of the Group and expand its business in the surrounding areas. With the continuous improvement of industry standards, Come Sure Group will continue to increase the production efficiency and to improve the quality product portfolio, as well as to strive to enhance its competitive advantage, so as to seize the major opportunities in China's corrugated paper packaging industry.

Business Structure of the Group



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About this Report

This is the second Environmental, Social and Governance Report (the “Report”) published by the Group. The report provides every stakeholder a better understanding of the progress and development direction of the Group regarding the issue of sustainable development by reporting the Group’s environmental, social and governance policies, measures and performance.

This Report is prepared in Chinese and English, both of which have been uploaded to The Stock Exchange of Hong Kong Limited (“the Stock Exchange”) and the Group’s website at www.comesure.com.

Scope of Report

The Report focuses on the production base of Come Sure Group in Shenzhen (the “Plant”) and the operation of the production of “corrugated paperboards and cartons”¹ during 1 April 2017 to 31 March 2018 (the “Year”). In order to facilitate the readers to compare the annual performance of the Group, the structure of this Report has been prepared as close as possible to the first report. The Report currently covers only most of the operations of the Group. However, the objective of the Group is to continuously improve the internal data collection process and gradually expand the scope of disclosure.

Reporting Criteria

This Report is prepared in accordance with the “comply or explain” provisions of the Environmental, Social and Governance Reporting Guide (the “Guide”) issued by the Stock Exchange, on the basis of the four reporting principles (materiality, quantitative, balance and consistency) set out in the Guide. To ensure the accuracy of the environmental Key Performance Indicators (“KPI”), the Group has commissioned Carbon Care Asia, a professional consulting company, to conduct a carbon assessment. Moreover, in order to improve reporting effectiveness, the Report includes the individual KPI specified in the “Proposed Disclosures” of the Guide. A complete index is inserted in the last chapter for readers to read this report based on the Guide.

Review of this Report

All information quoted in this report is sourced from official documents and statistical data of the Group, as well as management and operational information collected according to the systems of the Group. The Board of the Group has reviewed the Report.

Feedback

The Group values the feedback of the stakeholders. If you have any queries or recommendations about the content or the form of presentations of this report, you are welcome to contact the investor relations company of the Group for offering your advices and recommendations to the Board or the Company:

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¹ Being operated by Come Sure Packing Products (Shenzhen) Company Limited, a wholly-owned subsidiary of the Group.

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Communication with Stakeholders

The participation of stakeholders² is an important part of the business management of the Group for it to examine potential risks and business opportunities. Communicating with stakeholders enables the Group to understand their views, and it brings business practices of the Group closer to their needs and expectations, so as to properly manage the views of different stakeholders. The Group constantly communicates with key stakeholders within and outside the Group through various channels. This ensures that they are given an opportunity to understand the development and operating directions of the Group, as well as the opportunities for the Group to listen to their opinions in order to prioritize different issues, and to develop corresponding policies.

Ways of Communication with the Major Stakeholders during the Year

Internal stakeholders	External stakeholders
<ul style="list-style-type: none"> • Directors of the Group • Senior management • Middle management • General staff • New staff 	<ul style="list-style-type: none"> • Suppliers • Customers • Governments/regulatory authorities • Communities • Employees' families • Shareholders • Investors • Investment analysts • Banks
<p>Ways of communications:</p> <p>Meetings, emails, telephones, intranet, interviews, surveys, trainings, panel discussions, visits and exchanges, site visits, annual reports, announcements, general meetings, company's website and the Stock Exchange's website, etc.</p>	

As in the past year, in order to lay down the sustainable development strategies and direction of the Group, and to identify environmental and social issues that are important to the Group and its stakeholders, the Group commissioned an independent consultant, Carbon Care Asia to conduct management interviews. Based on the results of interviews and the advices of the consultants, the Group selected three out of eleven environmental and social aspects from the Guide as the key focuses for discussion in this report.

Emissions

Use of Resources

Employment

To ensure effective communication with stakeholders, the Group is committed to establishing communication channels with transparency and providing timely response. In the future, the Group will strengthen its interaction with stakeholders by further diversifying channels to increase our exposure to the stakeholders, and to bring about mutual benefits and create win-win relationships.

² "Stakeholders", also known as "interested parties", "equity owners" or "interested persons", refer to groups and individuals who have significant impact on the Group's business, or those who are affected by the Group's business, including directors of the Group, senior management, middle management, general staff, new staff, as well as suppliers, customers, governments/regulatory authorities, communities, employees' families, shareholders, investors, investment analysts and banks.

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Message from Executive Director

The online shopping boom around the globe has brought huge opportunities to the paper products industry. In response to the expectations for sustainable development in the society while further expanding our business, we seize the opportunity to enhance the quality of our products with strengthened environmental requirements. We are committed to promoting corporate social responsibility and combining economic and social benefits to create value for our stakeholders.

To reduce the environmental impact of emissions produced during the operations, our Shenzhen Plant has formulated comprehensive management and control procedures for the supervision and measurement of noise, wastewater, exhausted gases, greenhouse gases and other wastes. Systematic quantification of greenhouse gas emissions would help us understand the sources of emissions, and identify viable emission reduction targets and methods to make efforts to mitigate climate change.

Efficient use of resources is an indispensable part in achieving sustainable development, especially for the manufacturing industry that we engaged. By improving our product designs and reducing material consumptions, we minimize the burden on the environment without compromising the interests of our customers. In daily operations, we focus on fostering energy saving habits of our employees, and properly manage the use of energy, water and other consumables by different management measures.

We are committed to retaining talents by improving working environment, wages and benefits in order to maximise full potential of talents and give full scope to them, thus enabling the Group to continue to grow with the support of our employees. Our human resources management policy direction is to ensure that employees would not be discriminated, and a comprehensive complaint channel and complaint-handling mechanism have been established to protect the rights of the employees.

As an enterprise caring for the society, Come Sure Group aims at becoming the leader of sustainability in the industry. In the future, we will strengthen the communications with stakeholders on the aspects of environment, society and governance to meet their needs and work together with business partners to achieve sustainable development.

Come Sure Group (Holdings) Limited
CHONG Wa Ching
Executive Director

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ENVIRONMENTAL PROTECTION

Emissions

The Group actively responds to the global low-carbon economic development direction and fulfils its corporate social responsibilities. The Group has formulated for the Plant the Control Procedures for Noise, Waste Water and Exhaust Gases (《噪聲、廢水、廢氣控制程序》) and Management Procedures for Supervision and Measurement (《監視與測量管理程序》), which strengthen the management of waste water, exhaust gases, slag discharge and noise control. Meanwhile, inspection, measurement and analysis of the management process and evaluation on the environmental performance have been conducted to reduce the adverse impact on the regional environment and personnel health. The Group has performed external and internal monitoring for the environmental factors. For external inspection, we engage a qualified third party inspection company to, on a regular basis, monitor the project in respect of waste water, exhaust gases and noise, and provide an inspection report. Internal inspection is carried out by the administration and personnel department in accordance with the Environmental Checklist (《環境檢查表》) on an irregular basis.

Exhaust Gas Management

The air emissions of Come Sure Group are mainly generated from the natural gas boilers of the Plant and the mobile emissions from vehicles and forklifts.

Exhaust Gas Emissions	
Air Pollutants ³	Emissions during the Year (kg)
Nitrogen oxide	1,645.2
Sulfur oxide	35.6
Respirable particulates	147.0

The Plant has installed exhaust gas treatment devices for its equipment with high exhaust emissions and has conducted an annual review for all vehicles. The air monitoring of the Plant is conducted by a qualified inspection company on a quarterly basis to ensure that exhaust gas emissions are in compliance with Class II criteria of the second period specified in Emission Limits of Air Pollution (《大氣污染排放限值》) (DB44/27-2001) of Guangdong province; exhaust emissions from boilers are in compliance with Emission Standard of Air Pollutants for Boilers (《鍋爐大氣污染物排放標準》) (DB44/765-2010) of Guangdong province; and exhaust emissions from printing workshop are in compliance with the floating emission monitoring concentration limits under Emission Standard of Volatile Organic Compounds for Printing Industry (《印刷行業揮發性有機物化合物排放標準》) (DB44/815-2010).

³ The emissions of nitrogen oxide and sulfur oxide are only generated from the mobile emissions from vehicles and forklifts.

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Waste Water Management

Waste water discharged from the Plant is in compliance with Class II criteria of the second period specified in Discharge Limits of Water Pollutants (《水污染排放限值》) (DB44/26-2001) of Guangdong province, which strictly prohibits employees from directly discharging waste water into the sewage pipes. Oily waste water is centrally collected and delivered to qualified recycling companies for centralized processing. Waste water from cleaning machines and equipments and printing ink waste water will be reused by the workshop for production after being treated and satisfying prescribed standards.

Noise Management

The Plant has installed sound insulation and anti-vibration for equipment with high noise level, and a qualified inspection company is engaged on an annual basis to monitor the noise generated by the Plant to ensure the compliance with Type III standard under Standard of Noise for Industrial Enterprises at Boundary GB12348-2008 (《工業企業廠界噪聲標準 GB12348-2008》).

Waste Management

Waste arising from the Plant is categorized into "recyclable waste", "non-recyclable waste" and "hazardous waste". Among of which, hazardous waste mainly includes spent fluorescent tubes, spent batteries, ink cartridges; waste oil, oil tarpaulins, replaced oily components and waste batteries; waste coating, bitumen, paint generated from constructions; pesticide residues and their containers from greening work, etc. (including the residues after sewage treatment). The Plant generated approximately 55.6 tonnes of hazardous waste during the Year, such as sludge, waste engine oil and scrap packaging bags, which were centrally collected for treatment by qualified contractors. Recyclable non-hazardous waste, such as metal components arising from equipment maintenance, waste cartons, waste wooden boxes, glass bottles, waste plastics and waste paper, is sold or recycled for reuse. Non-recyclable non-hazardous waste generated during the Year amounted to approximately 90 tonnes, including construction waste, food waste from canteens and domestic refuse, are cleared and handled by the relevant municipal environmental sanitation department. In order to reduce waste generation, the Plant has introduced new sewage treatment equipment to optimize the sewage treatment process, thereby reducing the amount of sludge generated after sewage treatment. The Group will maintain its waste management measures and plans to disclose the relevant results in the future.

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Greenhouse Gas Management

As greenhouse gas emission is closely linked to climate change and global warming, enterprises around the world have introduced initiatives and targets with regard to carbon reduction. In response to the Notice of the State Council on the Issuance of the Work Plan for Greenhouse Gas Emission Control during the 12th Five-Year Period and the Notice of the General Office of the National Development and Reform Commission on the Implementation of Carbon Emission Rights Trading Pilot Programme, the Plant has formulated Management Procedures for Quality of Quantitative Data of Greenhouse Gases (《溫室氣體量化數據質量管理程序》) and Management Procedures for Quantification and Report of Greenhouse Gases (《溫室氣體量化和報告管理程序》), and has established a systematic greenhouse gas verification system to quantify greenhouse gas emissions from the Plant. During the Year, Come Sure Group commissioned Carbon Care Asia, an independent consultant, to conduct carbon assessment for quantifying the greenhouse gas emissions (or “carbon emissions”) generated from its operations. The quantification process is carried out based on the guidelines⁴ issued by the National Development and Reform Commission of the PRC, and ISO14064-1 and other International standards.

Greenhouse Gas Emissions		
Scope	Emissions in 2017- 18 (tCO2e)	Emissions in 2016 ⁵ (tCO2e)
Scope 1 – Direct greenhouse gas emissions		
Fossil fuel combustion – fixed source	3,033.0	2,048.9
Fossil fuel combustion – mobile source	172.7	
Scope 2 – Indirect greenhouse gas emissions from energy		
Purchased electricity	1,888.1	3,888.1
Total greenhouse gas emissions	5,093.8	5,937.0
Intensity of greenhouse gas (tCO2e/thousand production output)	0.13	Non-disclosure

Carbon emissions of the Group during the Year mainly derived from Scope 1 – fixed-source fuel combustion which represented approximately 60% of total emissions, followed by Scope 2 – electricity purchased from the grid, which represented approximately 37%. The Group will continue to assess, record and disclose its greenhouse gas emissions and other environmental data annually for the comparison with future data, so as to set further emission reduction targets and monitor the effectiveness in the future.

During the Year, there was no non-compliance related to emissions from the Plant within the Group. The Group will continue to improve the management of various emissions from the Plant and plans to disclose the results of the relevant measures in the future.

⁴ Guidelines for Calculation Methods and Reporting of Greenhouse Gas Emissions from Enterprises in Other Industries (Trial) (《工業其他行業企業溫室氣體排放核算方法與報告指南(試行)》)

⁵ Carbon emission data covers the period from 1 January 2016 to 31 December 2016. The Group will amend the reporting period of carbon assessment during the Year to be consistent with that of its annual report.

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Use of Resources

The resources used by the Group mainly include energy consumption by the Plant, such as natural gas, fuel for vehicles and purchased electricity, and production water. In respect of material consumption, the total consumption of raw materials for the production of corrugated paperboards and cartons amounted to approximately 73,440 tonnes, while the total consumption of pallet films and packaging straps for packaging finished products amounted to approximately 67 tonnes.

Total direct energy consumption
56,961.4 GJ

Total indirect energy consumption
3,582.1 MWh

The Plant has formulated Energy Saving Control Procedures (《節能降耗控制程序》), which includes measures to reinforce the management of resource consumption such as water, electricity, oil and paper, to ensure the efficient use of resources and improve work efficiency. Besides, the Plant has formulated detailed measures for energy saving and emission reduction to reduce energy consumption and expenses.

Based on industry characteristics, paper is the major consumables during the operation of the Plant. Warehouse staff responsible for the management of raw paper materials is required to control paper usage from the source in accordance with relevant requirements. During the production of cartons, substandard paper products in each process shall be sent to collator for reuse in producing other products to avoid waste. The Group is also committed to researching and developing new techniques to minimise the use of resources. Compared with the traditional paper packaging products, structural-designed cartons and paperwares of the Group consume relatively less raw paper.

Items	Key measures
Electricity saving	<ul style="list-style-type: none"> Putting on electricity saving signs in each department of the Plant; Stepping up inspection (at least once a week) to prohibit employees from using private appliances ; Air conditioning temperature should not be set below 26 degrees Celsius and lights should be switched off after work; Recording and analyzing the electricity consumption of each machine in the Plant every month, and reporting the analysis results to the relevant units; Installing electricity meters in the machines of each workshop, controlling the cost by monthly meter reading, statistical release and monthly statistical auditing; and Carrying out daily meter reading throughout the Plant, and inspecting and recording abnormal power consumption by the administration and personnel department.

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Items	Key measures
Water conservation	<ul style="list-style-type: none"> • Putting on water conservation signs in each department of the Plant; • Stepping up inspection (at least once a week) for timely water faucet replacement in case of leakage and dripping; • Recording and analyzing the water consumption of each unit every month, and reporting the analysis results to the relevant units; • Saving water with new techniques whenever possible under the premise that product quality is guaranteed; • Installing water consumption board in the workshop; • Replacing the problematic water meters to ensure accuracy; • Fully utilizing and reusing the waste water after sewage treatment in corrugating machines for beating pulp; and • Reusing the cooling water generated from workshop equipment.
Paper Saving	<ul style="list-style-type: none"> • Putting on paper saving signs in the headquarter of the Plant and office; • Adopting practice of double-sided printing except for financial information, contracts and important information; • Reinforcing the management of paper usage and conducting registration for paper collection; • Recording and analyzing the paper consumption of each unit every month, and reporting the analysis results to the relevant units; • Gradually carrying out paperless operations; and • Aggregating the total amount of copying paper on a monthly basis and promoting paper saving in the monthly report.

The Group will continue to improve the management measures of electricity, water and paper consumption of the Plant, and plans to disclose the results of the relevant measures in the future.

The Environment and Natural Resources

The Group complies with environmental laws and regulations in its daily operations and ensures that its operations are in compliance with statutory emission limits through regular environmental monitoring. The Plant has developed Control Procedures for Identification and Evaluation of Environmental Factors (《環境因素識別與評估控制程序》), requiring each department to identify relevant environmental factors, formulate management measures in response to important environmental factors, and promote the environmental awareness of employees by providing them training. The Plant has obtained the environmental management system certification ISO14001:2015; the Group has also be awarded the Forest Stewardship Council (FSC) certification for some of its packaging products.

The Plant manages the handling, storage, use and disposal of hazardous chemicals based on the Procedures on Hazardous Chemicals Control (《化學危險品控制程序》). The Plant has designated area for chemical storage and has equipped with adequate fire facilities for hazardous chemicals warehouses. Emergency drills and trainings are also arranged for all employees to ensure prompt and proper actions shall be taken in case of any environmental incidents.

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CARE FOR EMPLOYEES

Employment System

Being an enterprise adheres to the people-oriented principles and cares individual growth and development, the Group is committed to providing employees with a working environment in which they can demonstrate capabilities, create values and achieve comprehensive development. The Plant endeavours to safeguard the interests of employees. Our Employee Manual (《員工手冊》) and Control and Management System of Working Hours, Wages and Benefits (《工時、工資、福利控制管理制度》) cover information on recruitment, attendance, compensation, rest periods, benefits and anti-discrimination, allowing our employees to understand their rights and responsibilities, as well as the requirements of the Plant on employees' behaviours and disciplines. Although the Group has not devoted resources to formulate policies related to dismissal during the reporting period, the Group has specified the provisions for resignation in the labour contracts of employees, including employees' resignation, the termination of labour contracts by the Plant and automatic resignation.

In respect of employee recruitment, the Plant follows the requirements of Human Resources Management Procedures (《人力資源管理程序》) and qualified candidates shall not be rejected on the ground of race, nationality, gender, religious beliefs, political affiliation, age, region, etc. As stipulated in the Management System of Anti-Discrimination (《非歧視性管理制度》) by the Plant, the employment of candidates shall be determined by their skills. The Group maintains a working environment with equality and mutual respect to ensure that employees are not to be treated differently because of race, religion, age, disability, gender, marital status, pregnancy, social orientation, etc. The Plant attaches great importance to protecting the well-being of pregnant employees by formulating the Management System of the Protection of Female Workers during Pregnancy and Lactation Period (《女職工在孕期和哺乳期的保護管理制度》), which requires each department to pay attention to employees during pregnancy and lactation, and provide appropriate support and work arrangement and time schedule to reduce difficulties at work caused by physical and psychological factors.

The Group protects the employees' legal rights by establishing and safeguarding a labour system that is in line with legal and social responsibilities. The Plant has formulated the Management System of Anti-Mental and Physical Abuse (《反精神及肉體虐待管理制度》), which is applicable to the training of management personnel, to restrict any form of corporal punishment or physical contact, mental coercion and verbal abuse made by our management personnel, and employees' freedom shall not be restricted by any threatening behaviour or abusive language, violence, threats, illegal search, detention or other means.

In order to ensure efficient complaint channels available for employees and guide internal employees to use our internal complaint tools effectively, the Group has formulated the Management System of the Handling of Employees' Complaints (《員工投訴處理管理制度》). Employees can make real-name complaints through different channels such as by phone, letter, meetings, fax, complaint box or email. The general manager office of the Plant is responsible for collecting complaints and referring complaints to the relevant responsible departments for feedbacks in strict confidence. The Plant also caters for the needs of employees and helps employees maintain work-life balance by implementing various welfare measures and providing employees with leisure and entertainment facilities, such as canteen and dormitories as well as fitness equipment and recreational tables and seatings in the living area, to further reduce employee turnover rate.

Year	2016-17	2017-18
Employee turnover rate	4.5%	3.9%

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The Group has implemented national laws and regulations on employment in its daily operations, including Interim Provisions of Shenzhen Special Economic Zone on Enterprises Wage Administration (《深圳經濟特區企業工資管理暫行規定》), Labour Law of the People's Republic of China (《中華人民共和國勞動法》), Provisions of the State Council on Working Hours of Workers and Staff (《國務院關於職工工作時間的規定》), Regulations on the Recuperation Period for Illness or Non-work Related Injuries for Workers at Enterprises (《企業職工患病或非因工負傷醫療期的規定》), Regulations on Paid Annual Leave for Employees (《職工帶薪年休假條例》), Implementation Measures for Paid Annual Leave for Employees of Enterprises (《企業職工帶薪年休假實施辦法》), Regulations of the Shenzhen Municipality on the Wage Payment to Employees (《深圳市員工工資支付條例》), Regulations on Public Holidays for National Annual Festivals and Memorial Days (《全國年節及紀念日放假辦法》), Provisions of Guangdong Province on Labour Rights Protection of Employees (《廣東省企業職工勞動權益保障規定》), Special Rules on the Labour Protection of Female Employees (《女職工勞動保護特別規定》), Law of the People's Republic of China on the Protection of Women's Rights and Interests (《中華人民共和國婦女權益保障法》), Criminal Law of the People's Republic of China (《中華人民共和國刑法》) and Special Rules on the Labour Protection of Female Employees (《女職工勞動保護特別規定》). During the Year, there was no non-compliance in relation to employment within the Group. Looking forward, Come Sure Group will further improve its employment policy and management.

Health and Safety

The Group attaches great importance to the health and safety of our employees. In order to provide a healthy and safe working environment to minimize the potential dangers arising from the operation, the Plant has formulated the EHS (Environment, Health and Safety) Management System (《EHS(環境、健康、安全)管理制度》) and the System on Investigation of Production Safety and Hidden Peril Governance (《安全生產檢查與隱患治理制度》). The Plant has also set up EHS Management Committee and Machinery Safety Committee, of which the position of commander-in-chief acted as by our management representative. The main management personnel of each department participates in the management of such committees as its members. The EHS committee holds a quarterly meeting to discuss the issues including the health, safety and environment of the Plant, aiming to ensure that our operation is in conformity with PRC laws.

The Plant focuses on safe production, and provides all its employees with safety-related concept and training on relevant knowledge through the implementation of the System on Education and Training of Production Safety (《安全生產教育培訓制度》). Upon completion of such training, only those qualified employees may receive training with respect to productions and operations. The Plant provides work clothes, work cap and necessary personal protective equipment free of charge, while our workshops provide labels and instructions on how to utilize personal protective equipment. The protective devices equipped on the machinery in the Plant are in compliance with the relevant regulations. Employees must follow the safety operation procedures of the machine, and carry out regular maintenance of the machine in accordance with the Equipment Control Procedures (《設備控制程序》). In order to reduce the exposure to risks of employees during their maintenance and caring operation, the Plant has also specifically formulated the System on Management of Hazardous Energy Operation (《危險能源作業管理制度》) and the System on Management of Safe Operation in Limited Space (《有限空間作業安全管理制度》) to provide the employees who are involved in thermotechnical, mechanical and limited space operations with the relevant training and work guidelines.

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In order to prevent out break of fire accident, the Plant has formulated the System on Management of Fire Safety (《消防安全管理制度》) to improve employees' awareness of fire safety through various of measures including monthly update the bulletin board of fire safety knowledge and implementation of annual training or activities on relevant knowledge. The Security Committee conducts daily safety inspection, and full-time safety supervisors or safety officers conduct at least twice scheduled fire safety inspections throughout in the Plant on a daily basis. The Plant attaches great importance to the emergency plan and relevant training for safety accidents, and has formulated the Emergency Rescue Management System (《應急救援管理制度》) for the emergency circumstances such as potential occupational safety and health events or disasters arising from the operation in the Plant, which clarifies the duties of management at all levels, and takes the ensuring of life safety and physical health of our employees as a top priority.

During the Year, the Plant was involved in three cases of accident work injuries, which were caused by employee who sprained its waist while handling the goods, scratched its arm during the production process, and had an eye injury caused by packaging strap when packaging the goods respectively. The Group made an analysis to the causes of each accident and conducted rectification and treatment measures, especially laid emphasis on training employees to enhance their awareness of prevention, and wrote reports on accident work injuries.

The Group complies with PRC laws and regulations on health and safety in its daily operation, including the Work Safety Law of the People's Republic of China (《中華人民共和國安全生產法》), the Fire Control Law of the People's Republic of China (《中華人民共和國消防法》), the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases (《中華人民共和國職業病防治法》), Regulations on Safety, Labour and Health of Guangdong Province (《廣東省安全勞動衛生條例》), the Production Safety Regulations of Guangdong Province (《廣東省安全生產條例》), the "Standards and Procedures of Safety Equipment Management for each Labour Unit (《用人單位勞動防護用品管理規範》), the Management Measures on Heatstroke Prevention (《防暑降溫措施管理辦法》), Regulations on Supervision of Classification for Dust Hazards (《粉塵危害分級監察規定》) and the Guideline for Risk Management of Noise Occupational Hazard (《噪聲職業病危害風險管理指南》). During the Year, the Group did not identify any illegal or non-compliant cases relating to health and safety.

Development and Training

The Group arranges various types of employee trainings to not only help them improve their work skills and improve operational efficiency, but also provide opportunities for their personal development. The administration and personnel department of the Plant will summarize and integrate the training needs of each department according to the Regulations on Management of Employee Training (《員工培訓管理規定》), and formulate an annual training plan. Each employee is required to receive work-related trainings. The types of training include induction training, on-the-job training and special post training. The implementation of the training includes internal and external training. The Group will make an evaluation to the results of training through various ways including written examination, oral examination, practical operation and spot check.

During the Year, the training of the Plant was focused on improving the professional skill, working skills and environmental protection and safety awareness. The Plant also arranged more employee trainings, as a result of which, training hours per employee increased by 6 hours as compared to that of last year.

Year	2016-17	2017-18
Training hours per employee	50	56

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Training Focuses During the Year

Trainees	Training Program Description
Entry-level employees	Induction training and Pre-employment training
Carton Department	"7S" and safety
	"Field loss, auxiliary material consumption" training
	"Efficiency, quality, service" training
	Carton inspection standard
	Professional quality and professional standards
Quality Department	Product barcode printing technology
	Corporate management policy and objective, and performance indicators of quality department
	Control of environmentally hazardous substances
Statistics Group/Material Department	Team building
	Learning to use fishbone diagram analysis
Production Planning Department	Emotion management
	Professional literacy
Administration and Personnel Department	Safety and fire management
	Employee spirit and mentality
	Effective communication skills
Technology Department	Printing machine working principle
Logistics Department	Management of warehouse in/out for finished product
	ISO knowledge training

Labour Standards

Given that protection of human rights represents fundamental conditions for sustainability, the Group is committed to safeguarding human rights and adopts the zero-tolerance approach towards child labour or forced labour. In compliance with the relevant PRC laws and regulations governing the prohibition of employment of child labour, the Plant formulates the System on Protection and Management of Child Labour and Juvenile Worker (《童工及未成年工保護管理制度》), according to which, the Plant will carry out inspection over the backgrounds and identification documents of the job applicants during recruitment to ensure that they meet the statutory age for employment and prevent use of child labour. At the same time, the Group stipulates that underage employees (i.e. employees over the age of 16 but under the age of 18) are forbidden from participating in dangerous work, night work and overtime employment. In case that any child labour is recruited by the Group, the Plant shall immediately give severance payment and full payment of wages and escort the child labour to his/her place of origin in healthy and safe condition.

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As forced labour is in violation with the basic human rights and international conventions on labour, the Plant has implemented Regulations for Management of Non-forced Labour (《非強迫勞工管理制度》), pursuant to which, the Plant makes clear its stance to all employees that the Plant prohibits forced labour by means of violence, threats or illegal restrictions on personal freedom of employees, and establishes complaint channels (such as employee representatives and suggestion boxes) for our employees to reflect their opinions. If employee representatives identify forced labour, they shall collect evidence and arrange for a timely communication with management representatives to seek a solution together.

To enhance the understanding of the labour standards among our employees, the Group clearly sets out in the Employee Handbook (《員工手冊》) the contents about the identification of child labour and the elimination of forced labour. The Group implements laws and regulations on labour standards in its daily operation, including the Law on Protection of Minors of the People's Republic of China (《中華人民共和國未成年人保護法》), the Labour Law of the People's Republic of China (《中華人民共和國勞動法》), the Criminal Law of the People's Republic of China (《中華人民共和國刑法》) and the United Nations Convention on the Rights of the Child (《聯合國兒童權利公約》). During the Year, the Group did not identify any illegal or non-compliant cases relating to child labour or forced labour.

OPERATING PRACTICES

Supply Chain Management

The Group values its collaboration with suppliers, and establishes partnership with suppliers to optimize its operation process and improve its operation quality. The major materials purchased by the Plant include raw paper, starchy flour, borax, caustic soda, ink painting, paper lamination adhesive and packaging tape. To improve and control the environment and social risks of our suppliers, the Plant has compiled the Procurement Control Procedure (《採購控制程序》) and Supplier Management Procedure (《供應商管理程序》) to standardize the process for evaluating the suppliers, aiming to ensure that the purchased products and services meet the quality and environmental requirements for our production.

Every year, the Plant develops an annual supplier evaluation plan based on the delivery date, quality and service of each supplier, and conducts a written or on-site evaluation of the supplier. An annual review of a supplier includes:

- punctuality of past deliveries of the supplier;
- product quality performance of past deliveries of the supplier;
- credit history and company image of the supplier;
- product price of the supplier;
- quality of service of the supplier; and
- whether the materials of the supplier can meet environmental requirements.

The Group also conducts an assessment and management on the level of risk of a supplier. With regard to the substances that are required to be of concern in accordance with international and domestic regulations and our customers, the Plant identifies the substances with a nature of high-risk and low-risk. High-risk substances are mainly found in materials such as ink painting, white latex, stapling wire, caustic soda and borax, the Plant therefore regards such suppliers supplying related materials as high-risk suppliers. For high-risk suppliers, the Group conducts a monthly examination and evaluation and at least a yearly on-site assessment, and arranges environmental testing for each batch of materials supplied by high-risk suppliers and requires such suppliers to provide material safety data sheets for related materials.

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Product Responsibility

Attaching great importance to product quality and safety, the Group continues to monitor quality and implement safety standards. The Group monitors the entire production process from receipt of materials, production to product shipment.

Quality Management

In order to standardize the quality check and testing activities for the processes including incoming, manufacturing, finished product and shipment, the Plant has formulated the Procedures for Product Inspection Control (《產品檢驗控制程序》) to ensure the production and delivery of qualified products and services to our customers, all of which aims to ensure that the products and services can meet the requirements specified by the customers and the EU Packaging and Packaging Waste Directive (《包裝及包裝廢棄物指令》) after delivery. The quality inspection of the Plant is divided into Incoming Quality Control (IQC), Final Quality Control (FQC), Outgoing Quality Control (OQC) and Product Testing Control (PTC). According to the Operational Guidelines for Incoming Inspection (《進料檢驗作業指引》), the Plant will inspect the incoming of raw and auxiliary materials for the production to ensure the receipt and use of qualified raw and auxiliary materials. Cybercouteau machinist for paperboard process will make an independent inspection for the finished paperboard in accordance with the Operational Guidelines on Inspection for Corrugated Paperboard Process (《瓦楞紙板工序檢驗作業指引》) and the Product Inspection Standards (《產品檢驗標準》). Each process for the Carton Department will make an inspection based on the work sheet, the draft design or the sample according to the operational guidelines for the process and the Product Inspection Standards (《產品檢驗標準》). The important processes such as printing machines, die cutting machines, folding and gluing/nailing machines will make inspections based on the work sheet, the draft design or the sample according to the operational guidelines on inspection for respective manufacturing and the Product Inspection Standards (《產品檢驗標準》). The products from Come Sure Group meet ISO9001, ISO14001 and IECQ-QC080000 and other international standards including the European Restrictions of Hazardous Substances (RoHS) and the Waste Electrical and Electronic Equipment Directive (WEEE) adopted by the European Union.

The Plant attaches great importance to the disposal of non-conforming products. Only those products that are required to pass the quality inspection for incoming and the environmental confirmation (the implementation of which is based on the Procedures for Hazardous Substances Management (《有害物質管理程序》) can be deployed to produce in each production process. The non-conforming products shall be disposed of in accordance with the Non-conforming Product Control Procedure (《不合格控制程序》). The Plant has formulated the Correction and Prevention Management Procedure (《糾正預防措施管理程序》), aiming to eliminate the causes for occurring non-conforming products and prevent and reduce various risks existing in the management of quality/environment/hazardous substances. If there is a quality problem with the products that have flowed into the market, the Plant will arrange for the recall and disposal of such products according to the established procedures set out in the Operational Guidelines for Return Processing (《退貨處理作業指引》) to ensure product quality. During the Year, there were no any cases of recalling products in the Plant.

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Customers' Opinions and Handling

The Group values the establishment of efficient channels of communicating with customers so as to fulfil their requirements. The Group has set up the channels for complaints so that customers can submit their complaints and opinions on the quality of our services or products. The Group has formulated the Operational Guidelines on Handling Customer Complaints (《客戶投訴處理作業指引》) to standardize the handling procedures for customer complaints. By adopting the Procedures for Customer Satisfaction Management (《客戶滿意度管理程序》), the Plant conducts a survey every six months with its customers that have any business transaction with the Plant in the past three months. The survey covers five aspects including order follow-up services, quality control services, delivery services, company competitiveness and product hazardous substances. According to the customer satisfaction survey report for the first half of 2017, the Plant was of good overall management, guaranteed quality and punctual delivery, while there were still some problems that needed to be improved such as cost performance of products, response to urgent products and environment of the Plant. During the Year, the Plant received four complaints about the damaged appearance of corrugated carton products, which were handled in a timely manner, and the defective cartons were replaced for the customers.

Maintenance of Customer Data and Intellectual Property Rights

The protection of the security of customer data is the key to the Group in maintaining its excellent corporate governance and establishing its long-term mutual-trust relationship with its customers. The Plant has formulated the Business Ethics Standard Management System (《商業道德規範管理制度》) to take protective measures against the Group's trade secrets, which requires employees to have a sense of confidentiality, prohibits them from talking or transmitting confidential matters in public or by public telephones, or disclosing the Group's trade secrets in private contacts. The Group also undertakes that there is no any infringement of intellectual property rights in its operation and is committed to maintaining the intellectual property rights of its partners as well. The Plant has established a leading group for the protection of intellectual property rights, which is responsible for leading the management of the protection of intellectual property. Following the requirements of the Patent Law of the People's Republic of China (《中華人民共和國專利法》), the leading group stipulates that employees shall not disclose, publish, use, authorize others to use or transfer the intellectual property rights of the Company by abusing their powers or convenience from their work or in other ways.

Based on the nature of its business, the operations of the Group do not involve any advertising or labels. During the Year, the Group did not identify any illegal or non-compliant cases relating to product responsibility.

Anti-corruption

Anti-corruption is one of the basic principles for the international community to define corporate social responsibility. The Chinese government has been playing an active role in carrying out anti-corruption campaigns in recent years. The Group adopts a zero-tolerance policy on acts of corruption in any form, including bribery, extortion, fraud and money laundering, by undertaking that it shall strengthen the publicity and education of its employees so as to consciously resist various forms of commercial bribery. The Business Ethics Standard Management System (《商業道德規範管理制度》) of the Group states that employees are prohibited from offering or requesting any benefits to customers, and they are also not allowed to obtain orders from customers by improper means. The Plant encourages employees and external stakeholders to accuse and expose corruptions, and the channels for whistle-blowing include mail, suggestion box, telephone, or direct discussion with the senior personnel of the Group. The Group ensures that all aspects of the acceptance and investigation of the accusation will be strictly kept confidential.

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The Group implements PRC laws and regulations on anti-corruption in its daily operations, such as Chapter VIII of Article 287 of the Criminal Law of the People's Republic of China (《中華人民共和國刑法》). During the Year, the Group did not identify any illegal or non-compliant cases relating to corruption, and there were no any lawsuits on corruption related to the Group and its employees.

COMMUNITY INVESTMENT

As a corporation with commitment to social responsibility, Come Sure Group understands that the Company shall make contributions to community sustainability by giving back to the community in addition to maximizing the profit for its shareholders. The Group attaches great importance to the public welfare activities, actively responds to the losses caused by natural disasters, and cares for the disaster areas and people. The Group has formulated and adopted System for Corporate Social Responsibility Task Management (《企業社會責任工作管理制度》) to continuously focus on helping those from disaster areas and other underprivileged groups and contribute itself for the well-being of different social groups and the society as a whole.

OVERVIEW OF KEY PERFORMANCE INDICATORS

Environmental Performance

Exhaust gases	Categories	Emissions (kg)
	Nitrogen oxide	1,645.2
	Sulfur oxide	35.6
	Respirable particulates	147.0

Greenhouse Gas Emissions		
Scope	Emissions in 2017–18 (tCO2e)	Emissions in 2016 ⁶ (tCO2e)
Scope 1 – Direct greenhouse gas emissions		
Fossil fuel combustion – fixed source	3,033.0	2,048.9
Fossil fuel combustion – mobile source	172.7	
Scope 2 – Indirect greenhouse gas emissions from energy		
Purchased electricity	1,888.1	3,888.1
Total greenhouse gas emissions	5,093.8	5,937.0
Intensity of greenhouse gas (tCO2e/thousand production output)	0.13	Non-disclosure

⁶ Carbon emission data covers the period from 1 January 2016 to 31 December 2016. The Group will amend the reporting period of carbon assessment during the Year to be consistent with that of its annual report.

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Waste	Categories	Emissions (tonnes)	Density of emissions (tonnes/thousand production output)
	Hazardous waste	55.6	0.001
	Non-hazardous waste	90	0.002

Use of Resources		
Energy use		Energy consumption
Direct energy		
Natural Gas (GJ)		54,610.0
Gasoline (GJ)		213.6
Diesel (GJ)		2,137.8
Indirect energy		
Purchased electricity (MWh)		3,582.1
Total energy consumption (GJ)		69,857.0
Density of energy (GJ/thousand production output)		1.8
Use of water resources	Water consumption (cubic meters)	
	Year 2017–18	Year 2016–17
Total water consumption		16,456
Density of water consumption (cubic meters/thousand production output)		0.4
Use of materials	Consumption (tonnes)	
	Year 2017-18	Year 2016-17
Finished products production — raw paper		72,000
Finished products production — amylum		1,260
Finished products production — white emulsion		67.9
Finished products production — stitching wire		29.7
Finished products production — ink		82.9
Product packaging — pallet film		42.7
Product packaging — packaging strap		24.3
Total packaging materials used for finished products		67.0
Consumption intensity of packaging materials (tonnes/thousand production output)		0.002
		Non-disclosure

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Social Performance

Number of Employees

Gender	Position/Age	Aged below 30	Aged 30–40	Aged 41–50	Aged over 50	Total number (by gender)
Male	C-level management	0	0	1	0	384
	Senior management	0	5	10	2	
	Middle management	2	16	25	6	
	General staff	65	103	122	27	
Female	C-level management	0	0	0	0	147
	Senior management	0	0	1	0	
	Middle management	1	3	1	0	
	General staff	34	52	54	1	
Ratio of male to female employee in 2017–18		2.6 : 1				
Ratio of male to female employee in 2016–17		3 : 1				

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Number of New Employees

Gender	Position/Age	Aged below 30	Aged 30–40	Aged 41–50	Aged over 50	Total number (by gender)
Male	C-level management	0	0	0	0	32
	Senior management	0	0	2	0	
	Middle management	0	0	0	0	
	General staff	14	11	3	2	
Female	C-level management	0	0	0	0	31
	Senior management	0	0	0	0	
	Middle management	0	0	0	0	
	General staff	9	10	11	1	
Percentage of new employees to total number of employees in 2017–18		11.9%				
Percentage of new employees to total number of employees in 2016–17		13.8%				

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Employee Turnover

Gender	Position/Age	Aged below 30	Aged 30–40	Aged 41–50	Aged over 50	Total number (by gender)
Male	C-level management	0	0	0	0	12
	Senior management	0	0	0	0	
	Middle management	0	0	0	0	
	General staff	7	4	1	0	
Female	C-level management	0	0	0	0	9
	Senior management	0	0	0	0	
	Middle management	0	0	0	0	
	General staff	5	3	1	0	
Percentage of employee turnover to total number of employees in 2017–18		4.0%				
Percentage of employee turnover to total number of employees in 2016–17		4.5%				

Health and Safety

Year	Gender	Number of work injury	Rate of work injury (per thousand employees)	Number of working days lost due to work injury	Number of working days	Percentage of working days lost due to work injury	Ratio of work-related fatalities
2017–18	Male	3	5.65	95	115,200	0.06%	0
	Female	0		0	44,100		
2016–17	Male	2	5.45	105	118,656	0.09%	0
	Female	1		38	39,744		

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Training

Training	Gender/ Position	C-level management	Senior management	Middle management	General staff	Total
Number of employees trained	Male	0	17	49	317	530
	Female	0	1	5	141	
Total training hours	Male	0	3,610	1,640	17,264	29,779
	Female	0	350	70	6,845	
Percentage of employees trained in 2017–18		99.8%				
Percentage of employees trained in 2016–17		100%				
Average training hours in 2017–18		56				
Average training hours in 2016–17		50				

Suppliers

Location of supplier	Category of products provided by supplier	Purpose of products	Number of suppliers	Percentage of suppliers implementing relevant practices
Guangdong Dongguan	Raw paper	Carton production	2	100%
Guangdong Shenzhen	White latex	Carton adhesives	2	
Guangdong Shenzhen	Ink	Carton printing	1	

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ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORTING GUIDE CONTENT INDEX

Key Aspects	Description	Page Index/ notes
A. Environment		
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.	7–9
A1.1	The types of emissions and respective emissions data.	7–8,17
A1.2	Greenhouse gas emissions in total (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	17
A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	17
A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	17
A1.5	Description of measures to mitigate emissions and results achieved.	7–8
A1.6	Description of how hazardous and non-hazardous waste are handled, reduction initiatives and results achieved.	8

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Key Aspects	Description	Page Index/ notes
A2 Use of Resources		
General disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	9–10
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).	17–18
A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	18
A2.3	Description of energy use efficiency initiatives and results achieved.	9–10
A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency enhancement initiatives and results achieved.	9-10; No problem in sourcing water that is fit for purpose
A2.5	Total packaging materials used for finished products (in tonnes) and, where appropriate, with reference to per unit produced.	18
A3 The Environment and Natural Resources		
General disclosure	Policies on minimising the issuer's significant impacts on the environment and natural resources.	10
A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	10
B. Social		
B1 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, antidiscrimination, and other benefits and welfare.	10–11
B1.1	Total workforce by gender, employment type, age group and geographical region.	18
B1.2	Employee turnover rate by gender and age group and geographical region.	19

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Key Aspects	Description	Page Index/ notes
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 relating to providing a safe working environment and protecting employees from occupational hazards.	12
B2.1	Number and rate of work-related fatalities.	20
B2.2	Working days lost due to work injury.	20
B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	12
B3 Development and Training		
General disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	12–13
B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	20
B3.2	The average training hours completed per employee by gender and employee category.	20
B4 Labour Standards		
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 preventing child and forced labour.	14
B4.1	Description of measures to review employment practices to avoid child and forced labour.	14
B4.2	Description of steps taken to eliminate such practices when discovered.	14
B5 Supply Chain Management		
General disclosure	Policies on managing environmental and social risks of the supply chain.	14–15
B5.1	Number of suppliers by geographical region.	20
B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	14–15, 20

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Key Aspects	Description	Page Index/ notes
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.	15–16
B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	15
B6.2	Number of products and services related complaints received and how they are dealt with.	15–16
B6.3	Description of practices relating to observing and protecting intellectual property rights.	16
B6.4	Description of quality assurance process and recall procedures.	15
B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	16
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.	16
B7.1	Number of concluded legal cases regarding corruption brought against the issuer or its employees during the reporting period and the outcomes of the cases.	16
B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.	16
B8 Community Investment		
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.	16