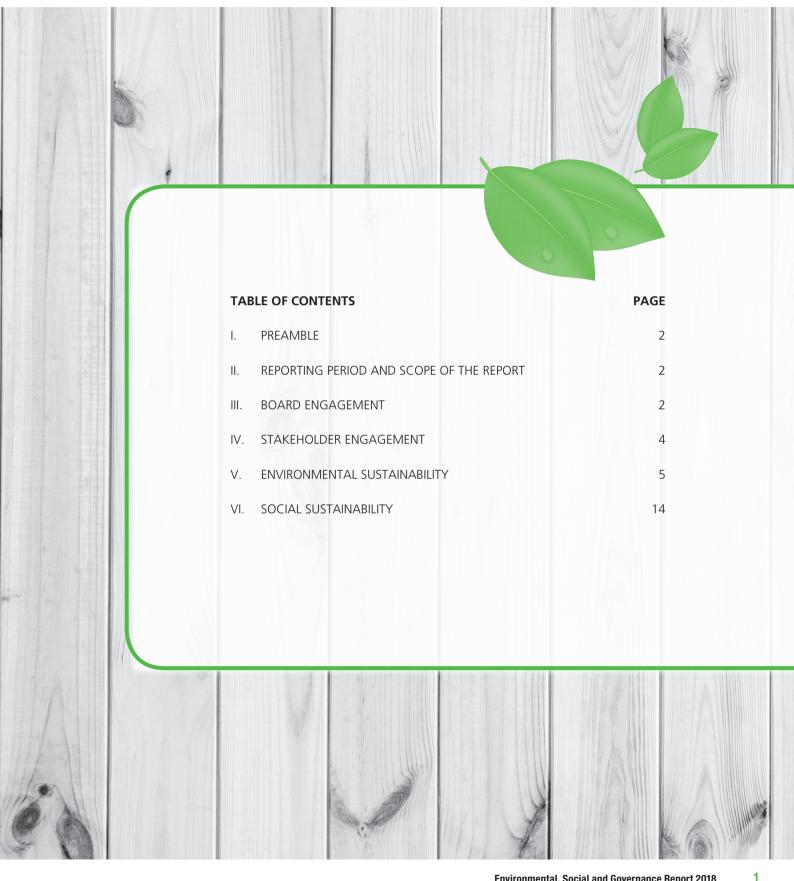
SANYI

SANY HEAVY EQUIPMENT INTERNATIONAL HOLDINGS COMPANY LIMITED

(Incorporated in the Cayman Islands with limited liability) Stock Code : 631

2018 Environmental, Social and Governance Report

Environmental, Social and Governance Report 2018



I. PREAMBLE

The board (the "Board") of directors (the "Directors") of Sany Heavy Equipment International Holdings Company Limited (the "Company", together with its subsidiaries, the "Group") believes that a sound environmental, social and governance structure is vital for continued sustainability and development of the Group. In addition to business growth, the Group pursues excellence in environmental protection and social responsibility. Meanwhile, the Group also wishes to enhance its transparency to achieve and uplift the sense of environmental protection and social caring amongst various stakeholders including shareholders and investors, employees, customers, suppliers, government and regulators. The Group adopts the Environmental, Social and Governance Reporting Guide set out in Appendix 27 to the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited (the "Listing Rules") as its standards, with an aim to establish a sound environment, social and governance structure.

This Environmental, Social and Governance Report (the "Report") is a review of the Group's performance in environment, social and governance areas for the period from 1 January 2018 to 31 December 2018. This Report is designed to allow shareholders, investors (including potential investors) and the public to have a more comprehensive and profound understanding of the Group's corporate governance and culture. The Group is willing to take more responsibilities for the society and balance the shareholders' interests and the society's benefits.

II. REPORTING PERIOD AND SCOPE OF THE REPORT

This Report covers the operational activities of the Group. The reporting period of this Report is for the financial year 2018 ("FY2018") from 1 January 2018 to 31 December 2018.

III. BOARD ENGAGEMENT

The Group implements a sustainable development strategy aimed at creating sustainable value for its stakeholders and benefiting the environment and society. The Group clearly recognizes the ultimate responsibility of the Board for sustainable development and ensures that the environmental, social and governance policies of the Group are effective. The effective supervision of the Board and the clear articulation of value are considered to be prerequisites and important drivers for the Company's sustainable development. The Board assesses the risk and opportunities of the environmental, social and governance affairs to ensure that the Group can timely and accurately adopt a series of risk management programs to ensure that the focus of the stakeholders is aligned with the long-term value of the Group.

In order to enable the Board to be informed of the latest ESG information in the market, and to keep abreast of the implementation of the relevant ESG policies as well as to assume full responsibility for the ESG strategic planning and supervision of the Group, the Group adopted a hierarchical management method governing its sustainable development. The Group believes that this management approach allows us to efficiently handle any ESG issues and ensure unimpeded communication between the Board and the management and employees.

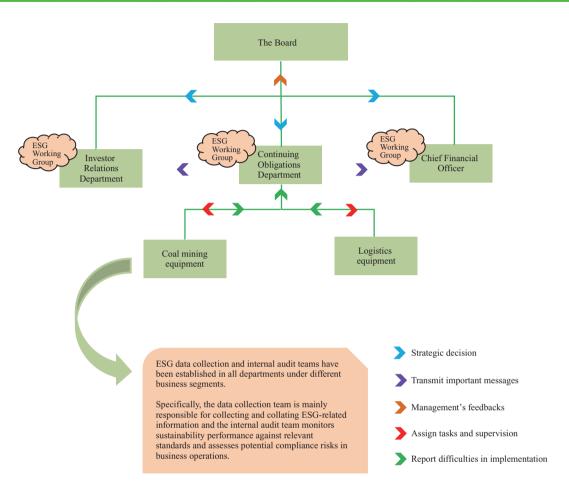
50

Governance Structure for Sustainable Development

| Hierarchy | Personnel | Managerial Duties |
|-----------------------------------|--|---|
| Leadership | The Board It consisting of 9 directors, and is the highest decision-making body for sustainable development management of the Group | Identify potential opportunities and risks of sustainable development. Develop a sustainable development strategy. Assess the effectiveness of sustainable development and track ESG-related indicators and progress. |
| Management and Coordination | Managerial Level It consists of the general manager and the managers of each department. They are responsible for handling and coordinating the environmental, social and governance issues, providing information needed for decision-making and supporting the implementation of the sustainable development policy. | Study specific work based on the sustainable development strategies. Guide, monitor and supervise the implementation of the sustainable development strategy in this business module. Adjust management methods based on the actual conditions and make recommendations to the Board. |
| Implementation | Business Divisions It consists of employees from each business module, who are responsible for implementing the instructions of the Company's environmental, social and governance affairs, and implements the concept of sustainable development into specific businesses | Carry out specific implementation work. Eliminate, reduce and manage risks. Report on the working conditions in a timely manner. |

In order to manage the sustainable development and ESG issues of the Group more effectively, the Group has established a sustainable development governance structure that clarifies the responsibilities of various departments in ESG management under the supervision of the Board.

Specifically, an ESG working group which comprises of professional groups of sustainability development and corporate social responsibility is responsible for the effective implementation of sustainable development and ESG management across all of the Group's business units, as well as the implementation of relevant policies. The ESG working group consists of the Investor Relations Department, the Continuing Obligations Department and the Chief Financial Officer. The Continuing Obligations Department is responsible for coordinating specific ESG issues with different teams and departments, and submitting relevant information to the Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer. The Investor Relations Department and the Chief Financial Officer.



With the joint management on ESG related issues by different departments, the Group ensures its sustainable development management follows the below five principles:

- a. The instructions of the Group can be conveyed to the whole company effectively;
- b. The proposed objectives can be realized within the specified time;
- c. The difficulties and challenges faced in the daily operation process can be promptly reported and be resolved effectively;
- d. The responsibilities are imposed to the personnel/departments/teams methodically; and
- e. The important laws, missions and suggestions in relation to ESG issues can be realized and be integrated into the major business strategies of all subsidiaries.

IV. STAKEHOLDER ENGAGEMENT

The Group acknowledges the need and importance of the stakeholder engagement as one of the key elements in ESG reporting. The Group is also committed to achieving a high standard of ESG that can properly promote the Group's goal to become a caring and responsible company to enhance corporate value.

4

- 19

During the preparation of this Report, the Group has communicated with its stakeholders and conducted a materiality assessment in order to identify and understand the main concerns and priorities of the stakeholders. The selected stakeholders are based on the influence of the stakeholders on the Group and their independence. The management of the Group has selected those who have great influence towards and high degree of independence from the Group. The selected stakeholders have been invited to express their views and concerns on major social and environmental issues via questionnaires. The Group believes that the participation of stakeholders is of a certain degree of influence on the formulation of sustainable development policy and the fulfilment of social responsibility, and also is the basis for the Group's strategy formulation and implementation decision-making.

After receiving internal and external stakeholders' feedback, the Group has consolidated the views of the stakeholders and the management and identified material issues according to the "Controlling Procedures of Hazard Identification and Risk Assessment" proposed by the Group. The Group has reviewed the sustainable development strategies, practices and measures conducted in FY2018 and outlined and disclosed the relevant issues in line with those expected by the stakeholders. In the report for FY2018, the Group recognized the major concerns of the stakeholders are the quality of products and services, the protection of consumer information and privacy policies, customer satisfaction and energy consumption.

V. ENVIRONMENTAL SUSTAINABILITY

The Group is committed to the long-term sustainability of the environment and community. The Group stringently controls the discharge of wastes, exhaust gases and sewage; and complies with the applicable laws, regulations and standards in the People's Republic of China (the "PRC") and the Hong Kong Special Administrative Region in relation to solid waste, exhaust gas and sewage discharge in the course of production, including the Environmental Protection Law of the PRC, the Law of the PRC on the Prevention and Control of Atmospheric Pollution, the Water Pollution Prevention and Control Law of the PRC and the Product Ecoresponsibility Ordinance. All subsidiaries of the Group have implemented stringent energy saving and emission reduction programs to reduce the use of paper, water and electricity. In order to ensure the implementation of each of the sustainable development policies, the Company has established the following regulating measures:

"Utilities Management System"

"Environment Management Regulation"

"Controlling Procedures of Environment and Safety"

"Cutting Center Programming and Residual Material Management System"

"Management Manual for Quality, Environmental and Occupational Health and Safety System"

"Controlling Procedures for Emergency Preparation and Response"

"Environmental Factor Identification and Evaluation Procedures"

"Environment, Safety Training and Management System for Related Parties"

"Quality, Environmental and Safety Information Communication and Communication Procedures"

This section will primarily disclose the information on use of resources, waste and carbon emissions and use of environment and natural resources and relevant internal practices for energy conservation and emission reduction during FY2018.

1. Emissions

A. Air pollutants

The Group's major air pollutants are derived from gas emissions from energy consumption such as gasoline, diesel and coal gas. The pollutants include nitrogen oxides (NOX), sulfur oxides (SOX) and suspended particulates.

The following table shows the details of the Group's major air pollutant emissions in FY2018.

Table 1: Information on major air pollutant emissions of the Group for FY2018

| Exhaust emissions 1 ¹ | Unit | Emissions during 2018 | Intensity (per RMB10,000 of output value) | Emissions during 2017 | Intensity during 2017 (per RMB10,000 of output value) |
|----------------------------------|------|-----------------------------|---|-----------------------------|---|
| Nitrogen oxides (NOX) emissions | kg | 1,176 | 0.003 | 1,039 | 0.004 |
| Sulfur oxides (SOX) emissions | g | 14,210 | 0.032 | 9,747 | 0.039 |
| Particulates emissions | g | 86,916 | 0.197 | 77,077 | 0.311 |
| Total ² | kg | 1,277 | 0.003 | 1,126 | 0.005 |

1 Since the mileage of forklift trucks cannot be calculated, this table does not include related information of NOX and particulates emissions from energy consumption of forklift trucks.

2 The main reason for the decline in air pollutant density is that revenue of the Company for the year 2018 has increased significantly. Such increase in revenue is greater than that of emissions.

Environmental, Social and Governance Report 2018

× 60

Other air pollutants generated by the Group mainly includes welding waste gas, metal dust generated from the shot peening process, spray paint and dimethylbenzene from the paint spraying process and lampblack from the staff canteen, etc. The Group has designed different treatments to the four main emissions mentioned above to optimize the removal efficiency. The waste gas is extracted by the draught fan from the exhaust hood installed on each welding position to the central dust cleaning system where it will be cleaned and released for reutilization. For the shot peening dust, there are two hermetic shot peening rooms, each of which is equipped with bag-type dust remover to clarify dust generated in the process. The treated gas will be exhausted through a 15-metre funnel. For the spray paint and dimethylbenzene, the Group has three spray chambers: the dry spray chamber, the drencher spray chamber and spray drying chamber. The dry one is totally enclosed type with spray dust filter unit, whose exhaust inlet is attached with activated carbon to adsorb organic gas. During the spray process proceeding in the drencher spray chamber, the free paint particles are led to the circulating water curtain by the air with almost 100% collection rate. The exhaust inlet is attached with activated carbon as well to adsorb organic gases. The organic gases like dimethylbenzene generated from the spray drying room go through the catalytic combustion device where they are transformed into carbon dioxide and water with above 95% purifying rate. The treated gas will be exhausted through 20-metre funnel. The Group has staff canteens in some subsidiaries in China which provide three meals to relevant employees per day. The emission of lampblack meets the requirement of Emission Standard of Cooking Fume (GB18483-2001). The Group uses an electrostatic lampblack purifier to treat the lampblack with a purifying rate of over 85%, and exhaust the treated gas with the concentration of the lampblack below 2mg/m³ through a 15-metre funnel.

B. Greenhouse gas

The Group's greenhouse gas ("GHG") emissions are mainly derived from gas emissions from energy consumption such as water, electricity, gasoline and diesel consumed in daily operations. The emissions in FY2018 were 31,383 tons (2017: 23,661 tons).

The Group is aware that the consumption of electricity indirectly leads to an increase in GHGs emissions. In order to reduce GHGs emissions, the Group is committed to energy conservation and emission reduction and improving the utilization of electricity. The detailed measures taken by the Group and the relevant achievement in electricity consumption reduction are further described in the next section headed "Use of Resources". To offset the GHGs, the Group has also taken other methods, such as to choose more environmental friendly paper supplier, to save the amount of paper and fresh water consumed by its staffs and to plant more trees in the operation sites. As for now, there are trees and shrubs, lawns and other plants planted in the factories, covering an area of 155,314 square meters in total (2017: 138,940 square meters).

As the management of the Group pays more attention to energy conservation and global climate change, and the implementation of corresponding policies and measures by all employees of the Group, the Group is expected to reduce the intensity of GHG emissions during the production process year by year. The following table shows the details of the Group's major GHG emissions in FY2018.

| GHG emissions | Unit | Emissions during 2018 | Intensity (per RMB10,000 of output value) | Emissions during 2017 | Intensity during 2017 (per RMB10,000 of output value) |
|--------------------------------|------|-----------------------------|---|-----------------------------|---|
| Carbon dioxide (CO2) emissions | kg | 31,225,528 | 70.695 | 23,548,667 | 94.902 |
| Methane (CH4) emissions | kg | 1,813 | 0.004 | 1,342 | 0.005 |
| Nitrous oxide (N2O) emissions | kg | 156,053 | 0.353 | 110,770 | 0.446 |
| Total ³ | kg | 31,383,395 | 71.052 | 23,660,779 | 95.354 |

Table 2: Information on major GHG emissions of the Group for FY2018

3 The main reason for the decline in greenhouse gas density is that revenue of the Company for the year 2018 has increased significantly. Such increase in revenue is greater than that of emissions.

C. Solid Waste

Solid waste produced by the Group includes general solid waste and hazardous solid waste.

General solid waste contains domestic solid waste, scraps from production and waste metal shavings. Domestic solid waste is collected and treated by the sanitation department while other general solid waste, including scraps from production, waste metal shavings and other non-hazardous waste, are recycled by dedicated staff of the Company and sold to professional recycling companies to turn waste into resource.

Hazardous solid waste such as used oil, paint residue and used paint buckets are separated, collected and stored at the solid waste disposal centre and sent to professional companies with hazardous waste disposal qualification at regular intervals for safety treatment.

To reduce the amount of solid waste generated, the Group has taken the following measures:

- Improve the cutting process to reduce the waste of steel in production and the amount of scrap generated;
- Develop water-based paints and high-solids environmental-friendly coatings to eliminate the generation of hazardous waste from the source;
- Raise the environmental awareness of the employees through environment education, save paper and reduce the generation of domestic waste.

n. 69

| | Unit | Amount during 2018 | Intensity (per RMB10,000 of output value) | Amount during 2017 | Intensity during 2017 (per RMB10,000 of output value) |
|----------------------------------|------|--------------------------|---|--------------------------|---|
| Hazardous waste ⁴ | ton | 182 | 0.00041 | 109 | 0.00044 |
| Used paint buckets | ton | 134 | 0.00030 | 70 | 0.00028 |
| Paint residue | ton | 13 | 0.00003 | 19 | 0.00007 |
| Spent mineral oil | ton | 36 | 0.00008 | 21 | 0.00008 |
| Non-hazardous waste ⁴ | ton | 30,856 | 0.06986 | 18,399 | 0.07415 |
| Scrap steel and iron | ton | 30,611 | 0.06930 | 18,217 | 0.07341 |
| Domestic waste | ton | 245 | 0.00055 | 182 | 0.00073 |

Table 3: Information on the solid waste of the Group for FY2018

4 The amount of solid waste produced has increased for the year 2018. Such change was mainly due to the significant increase of the use of paint and steel resulting from the increase of the production amount of the Group while the production waste also increased and the increase of equipment overhaul business of the Group has also resulted in the increase of spent mineral oil.

D. Wastewater

Wastewater generated by the Group includes industrial wastewater and domestic wastewater. The industrial wastewater is discharged by batch-type, including coating wastewater, cleaning wastewater before transportation of the finished product from warehouse, vehicle washing wastewater in the painting workshop, wastewater containing emulsified liquid, etc. There is an industrial wastewater treatment station in the operation site which is used to treat industrial wastewater before it is qualified to be discharged to the pipe network system and finally goes to the wastewater treatment plant. The Group has completed treatment equipment for wastewater containing emulsion and spray paint and has set strict internal discharge standard for industrial wastewater.

The Group strives to mitigate the impact the hazardous wastewater it generated. In 2018, the Group has taken a number of measures to reduce water consumption to achieve the goal of reducing wastewater discharge. For details, please refer to the next sub-section headed "Water Consumption".

E. Noise

Noise generated from the Group is mainly from the operations of air compressors, shot peenings, various welders and machine tools with the noise level in the range of 60-95dB (A). To control the noise, the Group has taken the measures as below: It installs muffler in the inlet of air compressor and vibration damping device between equipment and relevant bases. Besides, all the noise sources are placed inside workshops with tight windows and doors. Meanwhile, it plants tall trees around the operation site so that they will act as barrier to block the transmission of noise.

2. Use of Resources

A. Electricity Consumption

The Group's total electricity consumption during FY2018 was 43,244,324 kWh (2017: 33,082,486 kwh). The change was mainly due to (1) the increase of production volume and the electricity consumption of the plants of the Group, and (2) the increase of office electricity consumption due to an additional office building has been put into use. All electrical energy consumption comes directly from normal operations of the Group's factories and offices. In order to improve the utilization rate of electricity, the Group adopted a number of energy saving measures in FY2018, including:

- Switch off office lights when not in use;
- Switch off monitor power after leaving office for more than 10 minutes, and switch off power of copy machine, air conditioner and computer after working day;
- Turn down the air conditioning in the office and switch it off if not needed;
- Implement cleaning and maintenance programs to maintain efficient operation of office equipment such as refrigerators, air conditioners and shredders, etc.
- Replace high-power lamps with energy-saving lamps;
- Encourage staff to use stairs instead of elevators;
- Arrange specialists to conduct patrols irregularly after work to check whether the electronic devices are switched off.

B. Water Consumption

The Group's water consumption includes water for production workshop cleaning, domestic water for employees' canteens and employees' dormitories, and daily water use by employees during office hours. The water consumed by the Group was mainly from municipal water supply. The Group's total water consumption in FY2018 was 509,000 tons (2017: 486,000 tons). The change was mainly due to (1) the increase of production water of workshops due to the increase of production volume, (2) the idle dormitories were put into use again and (3) the increase of daily water use due to the additional office building. In order to improve the utilization efficiency of water resources, the Group has taken a number of measures to reduce water consumption including:

- Go low-flow. Replace traditional faucets or showers with those outfitted with lowflow restrictors;
- Arrange specialists to inspect the areas in charge, and shall repair timely once evaporating, emitting, dripping or leaking are found;

n 15

- Purchase water-saving equipment which may have higher upfront cost, but such cost can be promptly recovered by its water and energy-saving function;
- Reduce landscape water use. Consider planting native plants or other less water-intensive alternatives. Also consider installing a rain-harvesting system to collect water on site for landscape irrigation or using a sprinkler irrigation system to better control exterior water use;
- Encourage employees to be more involved. Every employee consumes water, so it is crucial to raise their environmental awareness to save water and energy as well as to brainstorm more water-saving measures.

C. Paper Consumption

In FY2018, total paper consumption of the Group was 13.5 tons (2017: 9.3 tons). Such change was due to the increase of the amount of printed documents resulting from the increase of business volume of the Group. To ensure efficient use of paper, the Group has made great efforts from the "starting point" to the "end point". The "starting point" means to indirectly reduce the paper consumption beyond the office physical boundary. In other words, to choose the more environmental friendly paper source as the supplier, through which to indirectly reduce the amount of trees loss while producing the same amount of paper; to choose recycled paper instead of normal paper to reduce natural resources loss in some cases. The "end point" means to directly reduce the amount of paper consumption through various measures in the office. The Group has also endeavoured to take the following measures to manage the paper consumption:

- To "think before print": use posters and stickers as the reminder for the office staff;
- To use both sides: set computer defaults to print double-sided when possible;
- Give a second chance: use paper printed on only one-side for draft or memo;
- E-mail tips: to remind staff consider the environment before printing e-mails;
- Go electronic: replace unnecessary paper forms by electronic systems; use email instead of paper letters; and present data by projection instead of paper during meetings.

D. Raw Materials

Raw materials consumed by the Group are mainly steel. In order to improve the utilization efficiency of raw materials, reduce waste and the generation of solid waste, the Group formulated the internal regulation entitled Sany International Management Regulation of Raw Material Processing and Leftovers. The regulation requires relevant responsible personnel to be in charge of the management of raw materials at different stages, and requires them to obey the regulation requirements for the proper use and management of raw materials, and fill in the corresponding record sheet. According to the completion of the management responsibility, the Group will reward or punish the relevant personnel.

E. Other Consumptions

Other resources consumed by the Group mainly include solid packaging materials, high-temperature water and diesel.

In FY2018, the Group's packaging wooden box consumption was 299,100 kg with a density of 0.677 kg per RMB 10,000 of output value (2017: 153,540 kg with a density of 0.619 kg per RMB 10,000 of output value), which was mainly used for purchasing raw materials and packaging components. Such change was mainly due to the increase of production volume of the Group, the increase of raw materials purchased, and the increase of wooden materials used in raw materials packaging and products packaging.

In FY2018, the Group's diesel consumption was 659,113 liters (2017: 408,436 liters), which was mainly used for equipment tests and forklift trucks lifting and transportation of materials in the production sites. Such change was mainly due to the increase of the production and shipping volume of the Group, and the significant increase of the fuel consumption of the equipment tests and forklifts.

In FY2018, the Group's high-temperature water usage was 33,912 GJ (2017: 25,392 GJ), which was mainly used for heat supply in the production sites. Such change was mainly due to the new heat supply to a building from the Group.

The Group has implemented the following methods to reduce other resource consumption:

- The public area controls the flow after the average room temperature reaches the target according to the actual room temperature, and implements intermittent heating;
- Install cotton curtain at the access door and close the non-main access door;
- Turn-off floor heating after work, i.e. on day off;
- Turn-off floor heating in unoccupied office area, only open inner loop to prevent freezing;
- Arrange preventive maintenance and regular maintenance of forklift trucks;

n. 69

- Increase the use of non-fuel consumption transfer tools and reduce delivery frequency;
- Recycle and reuse old wooden boxes.

The following table shows the details of the Group's energy consumption in 2018.

| Table 4: Detailed resource of | consumption of t | the Group by | category for FY |
|-------------------------------|------------------|--------------|-----------------|
| 2018 | | | |

| | | | | 2018 Intensity (per RMB10,000 of | | 2017 Intensity (per RMB10,000 of |
|-----------------------------|--------------------------|-------------------------------|------------|--|------------|--|
| Item Types o | f Resources | Unit | Amount | output value) | Amount | output value) |
| Direct energy consumption | Gasoline | Liter (L) | 153,743 | 0.35 | 136,339 | 0.55 |
| | Diesel | Liter (L) | 659,113 | 1.49 | 408,436 | 1.65 |
| | Towngas⁵ | Cubic meter (m ³) | 1,393,916 | 3.16 | 1,215,438 | 4.90 |
| Indirect energy consumption | Electricity ⁵ | kWh | 43,244,324 | 97.91 | 33,082,486 | 133.32 |
| | Heat ⁶ | GJ | 33,912 | 0.08 | 25,392 | 0.10 |
| Water consumption | Water⁵ | m ³ | 508,589 | 1.15 | 486,394 | 1.96 |

5 Excludes electricity consumption and water consumption information of Hong Kong headquarters office;

6 Heat consumption is mainly high-temperature water for heating.

3. The Environment and Natural Resources

In relation to the operation site, the Group is in strict compliance with the relevant laws and regulations and conducts regular inspection on the operation of the Group. The Group conducts energy recycling in the daily operation to save natural resources and promotes resources utilization efficiency.

The Group's routine operation exerts no adverse impact on its surroundings. According to the inspection results, the wastewater, exhaust gas, solid waste, noise and other environmental impacts arising from the operation process of the Group are in conformity with environmental laws and regulations. Besides, the Group values afforestation that the green landscaping site in the factory amounted to 155,314 square metres with a green ratio of approximately 24.0%.

The Group will continue to adhere to the safety, harmony and green development concept and put unremitting efforts to be a resource-saving and environment-friendly corporation.

VI. SOCIAL SUSTAINABILITY

EMPLOYMENT AND LABOUR PRACTICES

1. Employment

The Group persists in the combination of a people-oriented management philosophy and an innovation mechanism. Through diversity and humanistic management, the Group has established a close relationship of mutual trust and support between the Group and its staff, and created a positive, healthy and motivated corporate culture and working environment for its employees. Meanwhile, the Group cherishes talents and provides employees with a competitive remuneration mechanism. Moreover, the Group also incessantly optimizes its human resources structure, and improves its management methods in order to fully motivate employees' enthusiasm and initiatives.

The Group regards employees as one of the most important and valuable assets, seeking to provide a safe and sound working environment for employees and cultivate talents that are experienced in technology and management. By improving the remuneration system and career paths, we expect to establish a comprehensive incentive policy to carry forward the harmonious and stable employment relationship. The Group's human resources policies are in strict compliance with the applicable employment laws and regulations in the Hong Kong Special Administrative Region and mainland China, including the Employment Ordinance, Mandatory Provident Fund Schemes Ordinance, Minimum Wage Ordinance, Labour Law of the PRC, Labour Contract Law of the PRC and the Social Insurance Law of the PRC. The Group's Human Resources Department regularly studies the latest laws and regulations to update our related human resources policies.

The Group has developed strict internal systems as Recruitment Management System to clarify the recruitment responsibilities and standardize the employment standards and processes. The system requires that the employment department should make a formal request before recruiting. Human Resources Department needs to approve, post jobs and recruit, arrange initial interview, arrange employment department to conduct professional interview and final interview, and conduct background investigation. Finally, after the aforementioned whole process, they will formally hire the relevant personnel. With regard to promotion process, the Group has formulated the Management Promotion System and the General Personnel Promotion System, which require that the promotion assessment of general employees and management shall be carried out in strict accordance with the regulations. To motivate and reward our employees, the Group offers competitive and fair remuneration and benefits based on individuals' performance, professional gualifications, experiences and market benchmarks to attract, motivate and retain high-calibre workforce. We have the internal Performance Appraisal System and will conduct annual review to ensure that our staffs are recognised by the Group appropriately with regard to their efforts and contributions. Meanwhile, any termination of employment contract would be based on reasonable and lawful grounds. The Group strictly prohibits any kinds of unfair or unreasonable dismissals.

Environmental, Social and Governance Report 2018

5 B

To cultivate employees' sense of belonging, the Group provides its employees in mainland China with two days off per week. Financially, the Group provides housing fund and insurances in five areas including endowment insurance, medical insurance, unemployment insurance, industrial injury insurance, and maternity insurance. The employees in Hong Kong are provided with medical insurance, MPF and year-end bonus. On some traditional Chinese festivals, the Group also distributes bonus and gifts to the employees. The Group offers reasonable working hours and leave for our employees which are in line with local employment laws. In addition to statutory holidays stipulated by the region, employees are also entitled to annual leave, maternity leave, paternity leave, marriage leave, funeral leave and sick leave. The Group also provides family visit benefits to employees who have children living abroad, arranges for children to come to the Company to reunite with their parents during holidays, and the Company bears travel expenses and organizes parent-child activities.



2018 Family Activities for Employees of Sany International

Talent acquisition is vital to the Group's business future development. We encourage and promote the effective two-way communication system between the general staff and managerial staff. Employees maintain timely and smooth communication with the management, colleagues and partners of the companies within the Group through internal email, employee handbook, manager meeting, as well as real-time communication software. The interactive communication system benefits the Group's decision-making process and establishes a harmonious employer-employee relationship.

The Group is committed to create a fair, respectful and diversified working environment by promoting anti-discrimination and providing equal opportunity in terms of all human resources and employment decisions. The Group respects every employee and does not allow any judgment during the recruitment, training, KPIs assessment, promotion and review procedures regarding their race, religion, colour, gender, nationality, age, disability and any other factors.

To cultivate the sense of belonging of the employees, the Group will set aside a portion of fund for organising staff activities. In FY2018, the Group hosted a series of activities for its employees, including staff basketball contest, badminton contest, table tennis contest, pwrent-child sports day, Spring Festival Meal and dating party for youth. These events helped its employees to relieve stress, and embodied the Group's corporate culture of the spirit of solidarity and cohesion among its employees. Leveraging the advantage of collective procurement, the Group also organised group purchasing for merchandise with discounts from vendors as a benefit for employees.



Badminton Contest



Table Tennis Contest



Tug of War Contest



Fishing Contest

As at 31 December 2018, the Group had a total of 2,749 employees (2017: 2,950). Such change was mainly due to the outsourcing of the Group's cutting and machining processing businesses, which reduced the manufacturing workers. The table below shows the staff composition by types of employees, age distribution, employment type, job location, gender and employee turnover rate.

Table 5: Total number of employees by types of employees in 2018 (unit: number of employees)

| Job category | Manufacture | Marketing service | R&D technology | Operation management | Others | Total number in 2018 | Number in 2017 |
|--------------|-------------|----------------------|-------------------|-------------------------|--------|-------------------------|-------------------|
| Number | 1,331 | 461 | 389 | 544 | 24 | 2,749 | 2,950 |
| Proportion | 48.42% | 16.77% | 14.15% | 19.79% | 0.87% | 100.00% | 100.00% |

5 B

| Age | Permanent employees | Contract employees | Part-time employees | Total | Number in 2017 |
|------------------|------------------------|-----------------------|------------------------|-------|-------------------|
| Aged 30 or below | 236 | 757 | 0 | 993 | 1,215 |
| Aged 31-40 | 556 | 652 | 0 | 1,208 | 1,165 |
| Aged 41-50 | 273 | 167 | 0 | 440 | 470 |
| Aged above 50 | 71 | 34 | 37 | 108 | 100 |
| Total | 1,136 | 1,610 | 3 | 2,749 | 2,950 |

Table 6: Total number of employees by age and employment type in 2018 (unit: number of employees)

7 Part-time employees include 3 independent directors.

Table 7: Total number of employees and employee turnover rate by age and gender in 2018 (unit: number of employees)

| Gender | Aged 30 or below | Aged 31-40 | Aged 41-50 | Aged above 50 | Number of employee turnover ⁸ | Employee turnover rate ⁹ | Turnover rate in 2017 |
|--------|---------------------|---------------|---------------|------------------|--|---|-----------------------------|
| Male | 926 | 1,127 | 418 | 104 | 425 | 14.91% | 8.64% |
| Female | 67 | 81 | 22 | 4 | 39 | 1.37% | 0.57% |
| Total | 993 | 1,208 | 440 | 108 | 464 | 16.28% | 9.22% |

8 Number of employee turnover only involves employees voluntarily leaving the Company.

9 Employee turnover rate = Number of employee turnover (i.e. number of full-time employees voluntarily leaving the Company) ÷ average number of employees of the Group throughout the year.

Table 8: Total number of employees and employee turnover rate by age and geographic location in 2018 (unit: number of employees)

| Age | Hong Kong | China | Other locations | Total | Number of employee turnover | Employee turnover rate | Turnover rate in 2017 |
|------------------|-----------|-------|--------------------|-------|-----------------------------------|------------------------------|-----------------------------|
| Aged 30 or belov | v 0 | 993 | 0 | 993 | 200 | 7.02% | 4.99% |
| Aged 31-40 | 1 | 1,207 | 0 | 1,208 | 193 | 6.77% | 3.26% |
| Aged 41-50 | 0 | 440 | 0 | 440 | 55 | 1.93% | 0.79% |
| Aged above 50 | 2 | 106 | 0 | 108 | 16 | 0.56% | 0.18% |
| Total | 3 | 2,746 | 0 | 2,749 | 464 | 16.28% | 9.22% |

2. Health and Safety

Complying with the policy of "Safety First, Prevention Primary", the Group strives to provide and maintain a safe and healthy working environment in strict compliance with relevant laws and regulations in the PRC and the Hong Kong Special Administrative Region, including the Production Safety Law of the PRC, the Law of the PRC on the Prevention and Treatment of Occupational Diseases, Regulation on Work-Related Injury Insurance and the Occupational Safety and Health Ordinance. Furthermore, the Group has stipulated internal policies and safety management system and relevant rules and methods to ensure safe operation and get prepared for emergency.

The Group has established specific organizations to ensure safety production and environmental protection. Relevant departments are supposed to undertake specific responsibilities under strict rules. Besides, the Group sets safety production targets on an annual basis and conducts evaluation at the end of each year. The relevant departments or individuals will be awarded or punished accordingly based on the evaluation. The Group also has worked out different emergency plans for different situation, such as oil rag on fire in the workshop, power substation on fire, fire or explosion of the oil stocks, etc. Considering its business nature, the Group has also established regulations for management of major hazardous sources, hazard identification and risk assessment procedures. The Group strives to maintain a clean, tidy, smoke-free, non-toxic, nonhazardous, healthy and safe working environment.

In order to work on employees' health issues and entitlements, the Group spares no effort to enhance the physical fitness of employees and eliminate occupational hazards. The Group arranges free occupational health checks for relevant employees including entry physical examination, in-service physical examination and dimission physical examination. The Group also arranges free gynecological health check for female employees. The Human Resource Department ("HRD") is in charge of organizing the examinations and keeping record while each staffing department should assist the HRD to supervise the safety operation process and report to the HRD if any accident happens.

3. Development and Training

The Group offers different training and development opportunities to its staff in order to strengthen work-related skills and knowledge and improving operational efficiency and productivity. For new employees, we provide comprehensive orientation training to help them understand the Group's corporate culture, business flow, workplace health and safety rules, management systems and group development. For experienced staff, the Group has online learning website for employees and relevant department will occasionally share learning material through intranet. The Group provides training to the employees in terms of different stages of the work needs and requirements. Besides, the Group will arrange trainings for relevant staff when there are new technology, new equipment and new material that need to be mastered by the employees.

5 B



Internal Tutor Training









Marketing Skills Training



Product Knowledge Training

The Group attaches great importance to corporate safety training and cultivating safety culture. Therefore, it takes measures to enhance staff's safety awareness, improve safety quality in the operation site, reduce or eliminate accidents, and standardize safety education and training. In accordance with relevant provisions of the Group and the actual needs of the production site, the Group has formulated a safety training and education system. In addition to general safety training and pre-work safety education, all employees who are directly engaged in independent works at the operation site must undergo specific training and assessment. After passing the assessment, they will get the safety work permit and are required to undergo a formal review every year. For personnel engaged in special types of work, professional safety technical training shall be carried out in accordance with relevant requirements of the State. After passing the examination, a special operation permit shall be obtained before they can be employed, and they shall participate in the review regularly. In addition to obtaining the operation permit by the special operation personnel, it is necessary for the personnel to obtain the safety operation certificate issued by the Group. Before new processes, new technologies, new installations and new products are put into production, the competent department shall organize to establish new safety technical operation procedures and conduct professional training. The relevant personnel shall not be put on duty until they pass the examination.

4. Labour Standards

The Group strictly abides by the Labour Law of the PRC, Labour Contract Law of the PRC, Prohibition of Child Labour of the PRC, Law of the PRC on the Protection of Minors, Employment Ordinance of Hong Kong and other related labour laws and regulations to prohibit any child and forced labour employment. Human resources staff of the Group specify that applicants shall provide valid identity documents to guarantee that the applicants are lawfully employable in order to comply with the relevant laws and regulations on prohibiting child labour and forced labour. If applicants are found in providing any counterfeiting or forgery information, the Group or its subsidiaries have the right to dismiss the employee immediately.

OPERATING PRACTICES

5. Supply Chain Management

The Group is committed to maintaining a sustainable and reliable supply chain. It achieves this goal by conducting comprehensive evaluation of potential suppliers and thorough investigations of selected suppliers, imposing strict standards on the quality of suppliers' raw materials and services, and reviewing the suppliers' products, services, reputation, quality and their performance on fulfilling social and environmental responsibility so as to maintain a good and long-term relationship with suppliers.

In order to optimize the supplier management process and ensure the quality, cost, delivery, service, environment and social responsibility of the suppliers to meet the Group's requirements, the Group has formulated the internal policy entitled Sany International Production Supplier Life Cycle Management System (the "System"), and regularly adjusts it according to the actual situation. The System classifies the suppliers according to different circumstances and manages the suppliers during the whole supply process. Suppliers of the Group may apply for internal certification on a regular basis, and provide appropriate materials and reports for the Group's approval. The Group conducts the online management of suppliers through information system integration such as the global supplier portal (GSP), which requires the suppliers to update the GSP related information and qualification documents (including business license, tax registration certificate, organization code certificate, China compulsory certification, quality, environment and occupational health certificate) timely.

6. Product Responsibility

The philosophy about the products and service of the Group is to provide products with good quality up to the specification and keep in good relationship with customers and pursue win-win situation to both parties at all times. With regard to its product quality and safety, the quality management system is in line with the rules and regulations as stipulated by the PRC government such as Safe Production Law and Patent Law.

The Group has been audited and certified by a professional third-party company that its coal mining equipment and mining dump truck all meet the requirements of the GB/T 19001-2008/ISO 9001: 2008, ISO 14001: 2004+ Cor.1: 2009 and BS OHSAS 18001: 2007 standard.

The Group abides by the internal management program of clients' complaints to deal with products and services complaints. After the complaint is received, the relevant personnel should fill the relevant record form, attach the contract and relevant data, and return it to the relevant department. The special person will verify and analyze the complaint with the relevant department. Once confirming the complaints, the Group will work out specific solutions and respond to relevant clients and record the complaints. The fact that we attach great importance to the complaints processing strengthens our product offerings and service quality, and consequently enables us to

Environmental, Social and Governance Report 2018

5 B

stay competitive in the market. The Group also provides intelligent management for the equipment through the "Cloud Platform for Sany's Customers", under which the Group can instantly monitor the information of construction of equipment, location, key construction conditions, alarm, etc. and realizes the online fault diagnosis and provides one stop after sales services which connect the equipment suppliers, users, repairers, operators to provide an efficient management solution covering the whole lifespan of the equipment for the customers. In addition, in order to enhance the products' quality and service of the Group and to enhance the customer's recognition to the Group's equipment, the Group carried out the "2018 Value Services Global Campaign". Under the campaign, the Group's management, research and development, quality assurance and servicing personnel conducted on-site visits towards our customers and arranged service engineers to conduct equipment inspections to ensure safe and effective operation of the equipment. We organized skills training for customer operators to upgrade customer operation level. We also conducted seminars to widely listen to our customers' suggestions on our products and services and dealt with their demands.



Value Services Global Campaign of 2018



Sany Digital Management Platform

Intellectual Property Rights (IPR) is crucial to the Group's sustainable business growth. The Group strictly complies with relevant laws and regulations on protecting and maintaining IPR in the PRC such as Patent law of the PRC, Intellectual Property Law of the PRC and Tort Liability Law of the PRC. The production line has strict rules to control the process from receiving raw material to final marking to assure the product traceability and uniqueness. Besides, the Group will ask the relevant technicians to sign Confidentiality Agreement and Non-compete Agreement for the daily technical confidentiality work. The Group has engaged legal consultant to provide advice and supervision on product advertising policies and labelling policies, and to conduct legal review of advertising copyrights. For the year ended 31 December 2018, the Group received 23 patents for inventions, 2 utility patents, 3 design patents and 4 copyrights.

The Group engaged legal consultant to provide legal advice on and regulate the product advertising policy and identify labels policy, and conduct legal review on the advertising proposals. All advertising proposals should be reviewed by the legal consultant and approved by the Executive Vice President before officially published by the media in order to prevent violations such as false or exaggerated advertising labels. If there is a violation, relevant employees shall be liable for economic and legal liabilities under the law.

The Group is committed to abide by the Personal Data (Privacy) Ordinance and Consumer Council Ordinance in Hong Kong, and Law of the PRC on the Protection of Consumer Rights and Interests to ensure our customers' rights are strictly protected. All collected personal data is treated confidentially and kept securely. Only authorised personnel could access to restricted information with permission. During the reporting year, there were no substantial complaints received concerning breaches of customer privacy and losses of customer data. The Group prohibits the provision of consumer information to a third party without authorisation from the customers. Customers remain the rights to review and revise their data, and also remain the rights to withdraw from any direct marketing activities.

7. Anti-corruption

To maintain a fair, integrity and efficient business and working environment, the Group strictly adheres to the laws and regulations relating to anti-corruption and bribery as set out by the government of the PRC and Hong Kong that have a significant impact on the Group, such as Law of the PRC on Anti-money Laundering and Prevention of Bribery Ordinance.

Besides, the Group has formulated and strictly enforced our internal anti-corruption policy entitled the Regulations of Business Personnel Behaviours. All employees are expected to discharge their duties with integrity and self-disciplined, and they are required to abstain from engaging in any activities related to bribery, extortion, fraud and money laundering which might affect their business decision or independent judgment in the course of business operation which exploit their positions against the Group's interests.

50

HRD of the Group would conduct investigations against any suspicious or illegal behaviour which are related to bribery, extortion, fraud and money-laundering to protect the Group's interests. Corresponding assessment, consulting, investigation and punishment internal procedures are introduced in the Group. Furthermore, we have set up advice box and hotline to enable employees or outsiders to report any suspicious activities or misconducts and any person, company or organisation that has a conflict of interest with the Group.

The Group advocates a confidentiality mechanism to protect the whistle-blowers. They can report verbally or in anonymous writing to head of office and management with full details and supporting evidence regarding suspected or confirmed misconduct. Where a crime is suspected, a report shall be made to the relevant authorities.

8. Community Investment

As a responsible enterprise, the Group extends active presence in community activities to support public welfare in addition to its efforts in delivering business growth. The Group listens to community needs, and exerts itself to contribute to local economy and a harmonious environment. Apart from the scholarship donations to Wuhan University of Technology, the Group also cooperates with the Guangdong Polytechnic of Science and Technology to jointly build the concept of "Sany Academy" and establish joint scholarships to award outstanding teachers and students and promote talent cultivation.