

Great Wall Belt & Road Holdings Limited 長城一帶一路控股有限公司

(Formerly known as e-Kong Group Limited) (Incorporated in Bermuda with limited liability) (Stock Code: 524)

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

ABOUT THIS REPORT

The board (the "Board") of directors (the "Directors") of Great Wall Belt & Road Holdings Limited (the "Company" or "Great Wall B&R") herein present the Company's Environmental, Social and Governance ("ESG") Report (the "ESG Report" or the "Report") of 2018. This ESG Report provides an annual update of sustainability performance in respect of the material businesses and operations of the Company and its subsidiaries (collectively, the "Group"). It has been updated to reflect the interest of various stakeholders.

APPROACH TO ESG AND REPORTING

The Group's ESG philosophy is to create long-term value for its stakeholders that aligns with the growth and sustainability of its business and the environment it is in. The Group aspires to be a responsible corporate citizen and believes that transparency and accountability are important foundations for building trust with its stakeholders.

Therefore, the Board is committed to contributing to the sustainable development of the society and environment. Along with the commitment, the Board is responsible for evaluating and determining the risks in relation to ESG areas at the Group level. Through adjusting and defining risks, the Board is able to formulate a clear vision and key strategies and to monitor management to ensure that the proper ESG reporting measures and systems are in place.

SCOPE AND REPORTING PERIOD

This Report details the ESG performance of the Group for the financial year ended 31 December 2018 (the "Reporting Period" or "FY2018"). The Group applied the concept of materiality in planning and developing the ESG Report – unless otherwise indicated, the Report covers Great Wall B&R and ZONE Telecom Pte Ltd ("ZONE Telecom") in Singapore. The reporting scope of FY2018 is the same with the financial year ended 31 December 2017 ("FY2017") and could cover the Group's principal businesses, which provides the greatest potential for managing the environmental and social impacts of the operations in a holistic manner.

Great Wall Belt & Road Holdings Limited Hong Kong & Singapore Operations

Included in this Report

- Great Wall B&R
- ZONE Telecom in Singapore

REPORTING PRINCIPLES

In this Report, the preparation and presentation of related information are in accordance with the guideline set out in Appendix 27 of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "Guideline"). According to the Guideline, the following principles are underpinned:

- 1. **Materiality**: environmental, social and governance issues that have major impacts on investors and other stakeholders must be set out in this Report.
- 2. **Quantitative**: if key performance indicators (KPIs) have been established, they must be measurable and applicable to valid comparisons under appropriate conditions. They must also be able to describe the purpose and impacts of quantitative information.
- 3. **Balance**: this Report must provide an unbiased picture of the environmental, social and governance performance of the Group. It should avoid selecting, omitting or presenting formats that may inappropriately influence a decision or judgment by the reader.
- 4. **Consistency**: this Report should use consistent and disclose statistical methodologies to allow meaningful comparisons of related data over time. Any changes to the methods used must be specified in the Report.

STAKEHOLDER ENGAGEMENT

As part of the business strategies, the Group engages its stakeholders from time to time through on-going communications and collects their views on the ESG aspects that they regard as relevant and important. The key stakeholders include employees, customers, suppliers, investors and business partners etc. The Group maintains an open and transparent dialogue with its stakeholders through various channels including sharing the Group's latest information on company website, e-mails and meetings.

The Group also discloses its information regularly via announcements, notices, circulars and reports etc. Stakeholders may browse the Group's website at www.gwbrhk.com or contact the Group to obtain more information.

A. ENVIRONMENTAL

The Group acknowledges that global climate change is one of the most concerned environmental issues by the United Nations and the governments. The year-to-year increase in Greenhouse Gases ("GHG(s)") in the Earth is closely related to the recent extreme weathers, including heavy rains, floodings, droughts, heat wave, etc. Therefore, the Group considers the relevant environmental aspects in its operating activities, formulates effective measures for conserving energy and water, reduces waste generation and invests resources proactively to reduce the impact of its operations on the environment.

1. EMISSIONS

As the Group is principally engaged in delivering telecommunication services and solutions, it does not emit significant discharges, for instance, nitrogen oxides, sulphur oxides and respirable suspended particulates into water, land and air. In addition, the Group does not produce a significant amount of hazardous and non-hazardous waste from its businesses.

The Group's environmental impacts mainly stem from the energy usage and related GHG emissions associated with the business operations. Also, the Group has an impact through its use of paper and non-hazardous waste generation. The Group strives to minimise impacts on the environment by reducing air and GHG emissions, waste and wastewater discharges.

(a) Greenhouse Gases Emissions

The major source of air and GHG emissions the Group associated with is energy consumption regarding the purchased electricity used in daily office operations.

The total GHG generated by the Group during the Reporting Period was 29.70 tonnes of carbon dioxide equivalent (FY2017: 54.73), with an intensity of 0.83 tonnes of carbon dioxide equivalent per employee (FY2017: 1.61), comprising electricity consumption and disposal of paper waste.

Scope of GHG Emission	Emission Source	Emission (in tonnes of CO ₂ e)		Total Emission (in percentage)	
		FY2018	FY2017	FY2018	FY2017
Scope 1					
Direct Emission	N/A	N/A	N/A	N/A	N/A
Scope 2					
Indirect Emission	Purchased electricity	25.21	54.15	84.88%	99%
Scope 3					
Other Indirect Emission	Disposal of paper waste	4.49	0.58	15.12%	1%
Total		29.70	54.73	100%	100%

Table 1 – Total Greenhouse Gas Emissions in the Reporting Period

In order to reduce carbon dioxide and other air emissions generated by electricity consumption, the Group advocates energy efficiency. Through below means, the Group enhanced electricity consumption, therefore, reduced GHG emissions:

- Replacing electrical equipment with better energy efficiency;
- Retrofitting or installing energy-efficient lighting (e.g. LED, CFL, T5);
- Adopting partition in lighting areas based on actual operating needs;
- Turning off unnecessary electrical appliances and setting them in a sleep state during idle periods;
- Maintaining a room temperature of 25.5°C; and
- Installing timing devices in some equipment for automatic shutdown during non-office hours to avoid unnecessary energy consumption.

In addition to different means of reducing electricity consumption, the Group also works to reduce its carbon footprint by reducing business travels. The Group actively uses video conference call system platforms and email discussions to replace unnecessary business travels.

(b) Waste Management

The Group upholds the principle of waste management and is committed to the proper handling and disposal of all wastes from business operations. Due to the business nature, the Group did not generate a significant amount of hazardous waste during the Reporting Period, while the major non-hazardous waste generated was paper, with a weight of 0.94 tonnes (FY2017: 0.12), equivalent to 0.03 tonnes per employee (FY2017: 0.003).

Non-hazardous Waste	Unit	Consumption Quantity		Intensity (Consumption/Employee)	
		FY2018	FY2017	FY2018	FY2017
Paper	tonne	0.94	0.12	0.03	0.003

Table 2 – Total Non-hazardous waste produced by the Group during the Reporting Period

ENVIRONMENTAL EXCELLENCE

The Company is recognised for its commitment to adopting measures to reduce waste generated through the services and products it provides and has been awarded the "Excellence Level in Wastewi\$e Certificate" by Environment Campaign Committee for four consecutive years (2015-18).

2. USE OF RESOURCES

Acknowledge itself as part of the global village, the Group is committed to conserving resources for the purposes of environmental protection and operating efficiency. To pursue the commitment, the Group implements multiple measures in enhancing energy efficiency, minimising the use of paper, reducing water consumption and driving behavioural changes of employees.

(a) Energy

During the Reporting Period, the energy usage from daily operations of the Group are as follows:

Energy	Unit	Consumptio	n Quantity	Intensity (Consumption/Employee)	
		FY2018	FY2017	FY2018	FY2017
Electricity	kWh	42,108.00	57,607.00	1,169.67	1,694.30

Table 3 – Total electricity usage by the Group during the Reporting Period

(b) Water

The sustainable and responsible use of water resources is a key issue globally. The Group is aware that water scarcity, excessive demand and usage could pose a serious problem. Due to the business nature, the Group does not use nor discharge a significant amount of water.

In order to raise awareness of water conservation, the Group promotes water saving practices in the workplace. For instance, the Group offers tips to conserve water and shares them internally.

(c) Packaging Materials

Given the Group is principally engaged in delivering telecommunication services and solutions, there does not use a significant amount of packaging materials for finished products. Nevertheless, the Group upholds the principles of waste management and is committed to the proper handling and disposal of all wastes from business activities. With an emphasis on reducing, reusing and recycling, the Group aims to minimize the amount of waste generated. All waste management practices comply with relevant law and regulations.

In order to minimize the disposal of wastes to the landfill. The Group adopts and promotes green practices as follows:

- Engage in paperless meetings;
- Encourage double-sided printing and defaults;
- Apply soft-copy filing and distribution of documents to the Directors;
- Use reusable bulk water coolers, cups, crockeries and utensils;
- Gather materials for reuse, recycling and/or proper disposal (e.g. aluminium cans, glass, plastic, paper, textiles, mooncake tins and electronic waste);
- Collect and separate solid waste and recyclables, as well as hazardous waste arising from spent fluorescent tubes and cleaning materials; and
- Use environmentally-responsible liquid detergent, and refill and reuse empty bottles.

To achieve further reduction in paper usage and attain higher efficiency, the Group is planning to create an online platform in Hong Kong office for leave application in order to reduce paper usage and paperless filing.

(d) Compliance

The Group was not aware of any incidents of non-compliance with laws and regulations that have a significant impact concerning air and greenhouse gas emissions, discharges into water or land, or generation of hazardous and non-hazardous waste during FY2018.

3. THE ENVIRONMENT AND NATURAL RESOURCES

The Group is devoted to reducing any negative impacts on the environment. Through the strong commitment, the Group implemented controls on energy consumption and office resources consumption. The Group shall continue to assess the environmental risks of the businesses, review the environmental practices and ensure compliance with relevant laws and regulations.

B. SOCIAL

The Group believes in a happy and motivated workforce is the driving factor for sustained success. Along with the commitment, the Group devoted substantial resources to maintain a robust employee policy system, which include compensation, dismissal, recruitment, promotion, working hours, rest periods and other benefits.

In addition, the Group is dedicated to cultivating a healthy and safe working culture, as well as investing in securing and nurturing talent through training and development programmes that help employees achieve their potential. To achieve this, the Group creates opportunities to attract, develop, retain and reward talented employees by offering them, under different conditions, commensurate remuneration, personal growth, career development training, as well as fringe benefits, such as medical insurance, retirement benefits, pension, long service awards, leave vacation, share options and other employment benefits as detailed below.

1. EMPLOYMENT AND LABOUR PRACTICES

The Group is committed to building a strong team of employees who share the business mission and objectives. As of 31 December 2018, Great Wall B&R and ZONE Telecom employed 36 (2017: 34) employees in operations across Hong Kong, Mainland China and Singapore.

(a) Employee Engagement

The Group adopts two-way communications policy. Employees have many channels to express their concerns and communicate with management. The followings outline the various ways of communication channels:

- Noticeboard and newsletter the Group conveys general information, for instances, new hires, activities, policies and procedures updates to all employees;
- Meeting the Group holds regular meetings, where the executive directors of the Company and the management representatives share the Group's status and receive comments from employees; and
- Instant messaging tools the Group sets up chatrooms in the widely used mobile communication platforms, such as WhatsApp and WeChat to facilitate and encourage communications.

In addition, the Group also engages employees by holding various activities. For instance, casual gatherings, celebrating parties in Chinese New Year and Christmas, quarterly birthday parties and regular sports events were organised.

(b) Remuneration

The Group recognises employees' contributions fairly and objectively by implementing equitable remuneration policies. As such, the Group developed a corresponding policy and included it in the employee handbook to incentivise employees. For instance, the policy covers recruitment, promotion, discipline, working hours, leaves and other benefits. The remuneration mechanisms are reviewed and readjusted regularly to remain competitive.

In addition to the basic salaries, a wide range of benefits including the comprehensive medical and life insurance are also provided to employees. The Group offers the following benefits:

- Dental and medical benefits include hospitalization and out-patient benefits;
- Shorten working hours in some festivals, such as Chinese Winter Solstice Festival, Mid-autumn Festival and Chinese New Year Eve; and
- Overtime traffic and meal allowance for employees who leave the office after 10 o'clock in the evening.

Further, the Group recognises and rewards high-performance employees in a fair and transparent reward system. The discretionary reward is linked to the delivery of business goals and expected behaviours.

(c) Recruitment, Promotion and Dismissal

The Group is committed to adopting a fair recruitment and promotion policy that prohibits damage to equal employment opportunity or unfair treatment. As such, the Group strictly enforce an antidiscrimination policy and have zero tolerance for harassment in any form. All employees, irrespective of race, gender, religious belief, social origin or identity, geographic location, age, physical condition and marital status, receive equal opportunities.

(d) Rest Days and Holidays

The Group provides employees with various paid leaves and holidays as stated in the employment contract according to position ranking. For instance, the Group provides employees with statutory holidays, statutory maternity/paternity leave, study and examination leaves, marriage leave and annual leave. In addition, the Group provides paid statutory holidays to employees with relevant to the local laws and regulations.

(e) Compliance

During the Reporting Period, the Group has not identified any complaints or violation of laws in relation to recruitment, promotion, working hours, leave, equal opportunity, diversity, anti-discrimination and other entitlements and benefits.

2. HEALTH AND SAFETY

The Group strives to foster a safe working environment where all individuals are supported to succeed and can develop to their fullest potential. Further, the Group strictly abides by the relevant laws and regulations on occupational health and safety and have conducted practical safety management to effectively eliminate potential safety risks.

Along with the commitment, the Group adopts a wide range of health and safety initiatives. Safety officers are appointed to who have completed the external workplace safety training. The Group ensures fire safety in the offices by keeping the fire exits and lightening in good conditions, in addition to regular fire drills to ensure employees are familiar with the evacuation routes.

(a) Health and Safety Management

Given the principal businesses of the Group, it does not involve substantial safety hazards within the workplace. However, the Group spares no effort to advocate occupational health and safety. For instance, in Hong Kong, in addition to complying with occupational safety and health laws and regulations, the Group installed air purifiers to improve indoor air quality, cleaned the carpets, drinking fountains and air conditioning systems regularly, and applied pest control.

The Group reviews the health and safety policies and practices regularly. Any updates on the policies and practices are circulated to employees. A comprehensive recording system is in place for any health and safety accidents. The Group also established the notification mechanism, of which corresponding government departments will be informed of any substantial health and safety accidents. ZONE Telecom in Singapore participated in workplace safety assessment by the Work Safety and Health Council and has obtained bizSAFE level 3 re-certification consecutively for four years.

(b) Compliance

The Group has not identified any casualties or accidents in relation to workplace health and safety during the Reporting Period.

3. DEVELOPMENT AND TRAINING

The Group is convinced that it is key for an enterprise's sustainable development to discover talents and cultivate talent teams.

Apart from identifying and retaining the best talents, the Group offers employees opportunities to develop their knowledge and skills in personal and professional training, through sponsoring cross-development training programmes and seminars provided by vendors, workshops and conferences, regular sharing sessions, peer learning and on-the-job coaching, as well as reimbursement for external training courses to enhance their competencies in performing their jobs effectively and efficiently. In addition, the Group provides paid sabbatical leave to employees after considering their needs. For instance, leave for study or exams for professional qualifications is provided.

The Group also continually reviews the training and education needs of employees, assists employees to plan their career development, and encourages employees to participate in professional lectures, seminars and training courses to enhance their ability.

During the Reporting Period, employees of all grades and categories completed a total of 130 hours of training (FY2017: 104). Percentages of employees completing training by employee category are as follows:

Training Received by Employee Category during the Reporting Period



Chart 1 – Training Received by Employee Category during the Reporting Period

4. LABOUR STANDARDS

The Group's labour standards primarily focus on conformity with local labour laws and regulations. At all levels, child and forced labour are prohibited in the Group. The Group established a strict recruitment policy, of which only applicants meeting the age requirement are employed. Further, labour being forced to work by means of physical punishment, abuse, involuntary servitude, peonage or trafficking are strictly forbidden. Employees will not be forced to work overtime and may apply for flexible working hours depending on the work situation.

There were no non-compliance cases noted in relation to labour standards laws and regulations during the Reporting Period.

5. SUPPLY CHAIN MANAGEMENT

The Group adheres to communication, cooperation and joint growth in its supplier management policy. The supply chain of the Group comprises a variety of equipment and service providers in telecommunication, vendors for office equipment, as well as travel-related services. Through maintaining close communications, the Group achieves strengthened cooperation with suppliers and therefore, enhances their capability to supply environmentally friendly products.

To achieve the sustainability goal of establishing an efficient and green supply chain with suppliers and service providers, the Group applies the concept of environmental compliance and sound commitment to social responsibility into the contract terms. For instance, suppliers and service providers shall declare the following when necessary:

- Employee management legal compliance on the age of employees, working hours and contract terms;
- Labour management policies and measures to avoid the use and to address any case of child and forced labour; and
- Environmental management legal compliance on air emissions, waste water discharge, hazardous materials, resource efficiency and responsible materials.

In addition, the Group conducts periodic reviews on the performance of suppliers and service providers with the objective of better control and assurance on the products and service quality.

6. PRODUCT/SERVICE RESPONSIBILITY

The Group pays attention to the reviews of customers regarding the products sold by the Group. Along with the commitment, the Group also aims at providing high value-added telecommunication services with the highest degree of integrity to clients at competitive rates.

Customers may convey their opinions or complaints via established communication channels. The Group investigates and creates reports based on the feedbacks and takes corrective measures when necessary.

(a) Client Data Security

The Group believes that protecting customer data is critical to building a trusting relationship between companies and clients. The Group, therefore, developed a robust data protection policy and regulatory mechanism to control collection and access to data of clients.

In the daily operation level, data-protection software is installed on employees' computers. This enables employees to renewal login password at regular intervals. The software update is applied regularly to ensure the systems are secure from the latest cyber-attack.

Further, the Group is committed to safeguarding data protection at the corporate level. Access-right to the database is strictly controlled to avoid unauthorized access to customer information. Granting of the access-right is examined carefully and adhered by the designated management.

Regarding the paper document, the Group adopts control to ensure secured access. Shredding facility and containers of waste paper are locked and secured during storage and transit. Records of collection and destruction of waste paper are in place.

(b) After-sales Service & Customer Complaints

The Group established a Customer Service Department which is committed to providing excellent services to clients. Further, for IT security, the Group installed the SmarterTrack software, a cloud-based system to ensure zero-miss and the tracking of customer complaints. Employees are trained to handle client complaints in a prompt and courteous manner.

(c) Compliance

During the Reporting Period, there was no incident of non-compliance with laws and regulations concerning breaches of customer privacy, loss of data, as well as the provision of products and services.

7. ANTI-CORRUPTION

Honesty, integrity and fair play are important assets in the Group's business. The Group has zero-tolerance for bribery, extortion, fraud and money laundering. Anti-bribery and anti-corruption standards have been incorporated in the Group's internal policies and operating practices and these are communicated to employees as well as external stakeholders. The Group's commitment to respect human and labour rights and to ethical business conduct are outlined in the Group's Code of Conduct, with more detailed expectations and related procedures in the Group's Employee Handbook as well as subsidiaries' employment handbooks.

During the Reporting Period, no legal case regarding corrupt practices were brought against the Group or its employees.

8. COMMUNITY INVESTMENT

The Group believes that running a successful business is about achieving economic viability and fulfilling social responsibility. The Group, therefore, encourages employees to participate in volunteer work, nurturing a culture of care and mutual support. The Group will continue to regularly review and supervise its objectives for community investment, sponsorship and donation activities and the relevant approval policies.

OUTLOOK

The Group believes that the implementation of current measures on environmental protection and social responsibility is sufficient for compliance with relevant laws and regulations. Yet the Group will continue to review from time to time in response to the latest relevant requirements to strengthen its measures on environmental protection and social responsibility.



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