



文化傳信集團有限公司

(於百慕達註冊成立之有限公司)

(股份代號：00343)

CULTURECOM HOLDINGS LIMITED

(Incorporated in Bermuda with limited liability)

(Stock Code : 00343)

# 2019

環境、社會及管治報告

Environmental, Social  
and Governance  
Report



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# SCOPE AND REPORTING YEAR

## 範疇及報告年度

Culturecom Holdings Limited, together with its subsidiaries (collectively, the Group), is pleased to publish the third Environmental, Social, and Governance (the “ESG”) report, highlighting its ESG performance, with disclosure reference made to the ESG Reporting Guide as described in Appendix 27 of the Listing Rules and Guidance set out by The Stock Exchange of Hong Kong Limited (the “HKex”).

The Group is principally engaged in traditional publishing and intellectual properties (“IP”) licensing business; digital marketing; online and social business; retailing and wholesales business and catering business. This ESG report covers the Group’s overall performance in two subject areas, namely, Environmental and Social of key business operations in Hong Kong, the People’s Republic of China (the “PRC”) and Macau, from 1 April 2018 to 31 March 2019 (the “Reporting Period”), unless otherwise stated. The business operations to be reported include:

- The office in Admiralty, Hong Kong (hereafter the “Admiralty office”);
- The office in Tsuen Wan, Hong Kong (hereafter the “Tsuen Wan office”);
- The warehouse in Tsuen Wan, Hong Kong (hereafter the “Tsuen Wan warehouse”);
- The office in Macau (hereafter the “Macau office”);
- The office in Luoding, the PRC (hereafter the “Luoding office”);
- The office in Beijing, the PRC (hereafter the “Beijing office”); and
- The office in Guangzhou, the PRC (hereafter the “Guangzhou office”).

The major operational change during the Reporting Period is the fully set up operations of two offices in Beijing and Guangzhou. These newly established subsidiaries in the PRC serve as an important new revenue segment of digital marketing.

文化傳信集團有限公司連同其附屬公司(統稱「本集團」)欣然刊發第三份環境、社會及管治(「環境、社會及管治」)報告，主要匯報本集團於環境、社會及管治方面的表現，並參考香港聯合交易所有限公司(「港交所」)的上市規則與指引中附錄27所載《環境、社會及管治報告指引》作出披露。

本集團主要從事傳統出版及知識產權(「知識產權」)授權業務、數碼化市場推廣、在線及社交業務、零售與批發業務及飲食業務。除文義另有所指外，本環境、社會及管治報告涵蓋本集團在二零一八年四月一日至二零一九年三月三十一日(「報告期間」)於兩個重要範疇的整體表現，即於香港、中華人民共和國(「中國」)及澳門的業務營運的環境及社會範疇。報告的業務營運包括：

- 於香港金鐘的辦公室(下文統稱為「金鐘辦公室」)；
- 於香港荃灣的辦公室(下文統稱為「荃灣辦公室」)；
- 於香港荃灣的倉庫(下文統稱為「荃灣倉庫」)；
- 於澳門的辦公室(下文統稱為「澳門辦公室」)；
- 於中國羅定的辦公室(下文統稱為「羅定辦公室」)；
- 於中國北京的辦公室(下文統稱為「北京辦公室」)；及
- 於中國廣州的辦公室(下文統稱為「廣州辦公室」)。

於報告期間的主要業務變動為於北京及廣州的兩個辦公室全面投入營運。該等新成立的中國附屬公司為數碼化市場推廣的重要新收入分部。

# SCOPE AND REPORTING YEAR

## 範疇及報告年度

The board of directors of the Company (the “Board”) acknowledges that it has overall responsibility for the Group’s ESG strategy and reporting and for evaluating and determining the Group’s ESG-related risks. The Group has complied with all the “comply or explain” provisions set out in the ESG Reporting Guide during the Reporting Period.

本公司董事會(「董事會」)知悉本集團的環境、社會及管治策略及報告的責任，以及評估及釐定本集團的環境、社會及管治相關風險。本集團已遵守於報告期間的環境、社會及管治報告指引所載的所有「不遵守就解釋」條文。



# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

In order to identify the most significant aspects for the Group to report on for this ESG report, key stakeholders including frontline staff, directors, shareholders, customers and suppliers have been involved in regular engagement sessions to discuss and to review areas of attention which will help the business meets its potential growth and be prepared for future challenges. The Group is not hierarchical in culture and staff of any levels are free to communicate with directors to express their views.

Through the stakeholder surveys carried out during this Reporting Period, key material issues raised by the stakeholders all focused on social aspects, environmental aspects, on the other hand, were considered less relevant for the Group. This year's finding was similar to that of the Last Reporting Period, reflecting consistent considerations of the stakeholders of the Group as a non-manufacturing company.

為識別對本集團最為重要的方面以納入本環境、社會及管治報告作呈報，主要持份者(包括前線員工、董事、股東、客戶及供應商)已參與定期舉行的會議以討論及檢討需要注意的地方，這將有助我們的業務實現潛在增長，並作最好準備應對未來挑戰。本集團秉持無分階級的文化，而任何職位的員工均可與董事互相溝通，以提出意見。

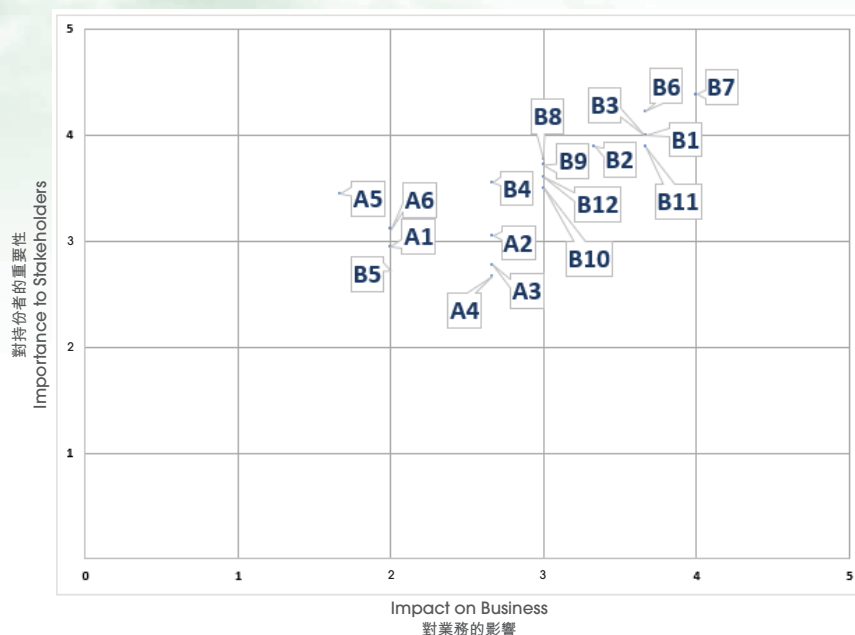
透過我們本報告期間進行的持份者調查，持份者提出的關鍵重大議題全部集中於社會層面。另一方面，環境層面則被視為與本集團較不相關。本年度的結果與本集團上一個報告期間的結果相若，反映本集團(作為一間非製造業公司)的持份者意見一致。

# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

### Materiality Matrix

### 重要性矩陣



#### A. Environmental

Energy	A1
Water	A2
Emissions	A3
Effluent and Waste	A4
Other Raw Materials Consumption	A5
Environmental Protection Policies	A6

#### A. 環境

能源	A1
水	A2
排放	A3
廢水及廢棄物	A4
其他原料的消耗	A5
環保政策	A6

#### B. Social

Employment	B1
Health and Safety	B2
Development and Training	B3
Labour Standards	B4
Supply Chain Management	B5
Intellectual Property Rights	B6
Customer Data Protection	B7
Customer Service	B8
Product Quality	B9
Advertising and Labelling	B10
Anti-corruption	B11
Community Investment	B12

#### B. 社會

僱傭	B1
健康與安全	B2
發展及培訓	B3
勞工準則	B4
供應鏈管理	B5
知識產權	B6
客戶資料保障	B7
客戶服務	B8
產品質素	B9
廣告及標籤	B10
反貪污	B11
社區投資	B12



# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

Among the social aspects, followings have been deemed as the most important by stakeholders:

- Customer Data Protection;
- Intellectual Property Rights;
- Employment; and
- Development and Training.

The key material aspects will be strictly managed through the Group's policies and guidelines. The Group will also propose solutions in relation to the key topics and considerations raised by stakeholders to the management in the hope of developing improvement schemes in each sector.

於社會層面方面，以下為持份者視為最重要事項：

- 客戶資料保障；
- 知識產權；
- 僱傭；及
- 發展及培訓。

關鍵重大議題將按本集團政策及指引嚴格管理。本集團亦將就持份者向管理層提出主要議題及考慮事項提出解決方案，以制訂各方面的改善計劃。

# STAKEHOLDERS' FEEDBACK

## 持份者反饋

The Group welcomes stakeholders' feedback on the environmental, social and governance approach and performance by giving suggestions or share views via email at [info@culturecom.com.hk](mailto:info@culturecom.com.hk).

本集團歡迎持份者透過電郵至[info@culturecom.com.hk](mailto:info@culturecom.com.hk)對環境、社會及管治方式及表現提供建議或分享意見。

# THE GROUP'S COMMITMENT ON ESG

## 本集團於環境、社會及管治的承擔

### MISSION AND VISION ON ESG

As one of the original founding members of the Hong Kong Comics and Animation Federation Limited, the Group is committed to driving business growth in a way that foster a sustainable and socially stable society.

The Group's recent business focus closely aligns with its overall vision on ESG. In face of the rise of the new media in replacing traditional print media, the Group has strategically shifted its development focus to IP licensing and digital marketing. The Group has devoted more resources on digitalizing its IPs and adopted online technologies for digital marketing. Compared with traditional publishing, information digitalization will bring in environmental benefits including saving forest resources, increasing supply chain efficiency, and reducing manufacturing resource consumption.

The strategic vision was reinforced through acquiring and establishing technology companies in the PRC during the Reporting Period. The Group acquired Eqmen Technology Limited (the "Eqmen") which is principally engaged in the digitalization and commercialization of IPs, content creation, agency of IPs services and digital marketing. The acquisition certainly enriches the Group's portfolio of the licensing of IPs business with immediate access to technical skills in the digitization of IPs. The Group expects a transition from the existing scope of traditional licensing model to a digitized and technology-driven licensing model in a bid to expand its business scope. In addition, the Group also has entered into a joint-venture with Beijing WeiResearch Info Technology Limited in Beijing, which has ongoing business relationships and contractual arrangements with a number of electronic media and electronic social media including but not limited to Sina Weibo, WeChat, TikTok, Kuaishou, etc. This allows the Group to supplement Eqmen's IP marketing by deepening the overall technical capabilities of marketing media analysis.

### 環境、社會及管治的使命及展望

作為香港動漫畫聯會有限公司的原創辦成員之一，本集團致力以推動可持續發展及社會穩定方式推動業務增長。

本集團近期業務重點與其環境、社會及管治的整體展望有密切關係。面對新媒體興起取代傳統印刷媒體，本集團已將其發展重點策略性地轉移至知識產權授權及數碼化市場推廣。本集團已投放更多資源用於數碼化其知識產權，並採用數碼化市場推廣的線上技術。與傳統出版相比較，資料數碼化將為環境帶來益處，包括節省樹木資源、提升供應鏈效率及減少製造資源消耗。

於報告期間，本公司透過收購及成立位於中國之科技公司以加深策略願景。本集團收購了北京易奇門科技有限公司（「易奇門」），其主要從事知識產權數碼化及商業化、內容創建、知識產權代理服務及數碼化市場推廣。該收購事項無疑地提升本集團的知識產權授權業務的組合，並可立即取得知識產權數碼化的技術技能。本集團預期由傳統授權模式的現有範疇過渡至數碼化及技術驅動的授權模式，以擴大其業務範圍。此外，本集團亦已與北京微瑞思創信息科技股份有限公司於北京成立合資公司，該公司與多間電子媒體及電子社交媒體維持業務關係及合約安排，包括但不限於新浪微博、微信、抖音、快手等。此舉使本集團能夠透過深化市場推廣媒體分析的整體技術能力輔助易奇門的知識產權市場推廣。

# THE GROUP'S COMMITMENT ON ESG

## 本集團於環境、社會及管治的承擔

### MISSION AND VISION ON ESG (Continued)

With the active expansion of its business and influence within Mainland China, the Group expects an extension of its business's demographic network and expertise. It is believed that this collaboration will bring in enormous benefits to the Group's future development and promote its IP and licensing business and digital marketing business. While this decision is strategically implemented, the Group believes that by expanding the IP business in mainland China, the Group can bring in its own knowledge and expertise contributing to a stronger and more standardized IP business operations. Moreover, the Group believes that such expansion has a broader social impact. More people will be educated of the importance of IPs and be more aware of digital marketing in the information era. This, in turn, will help minimize the potential infringements on traditional IPs and digital IPs in mainland China.

### CONTINUOUS IMPROVEMENT AND MONITORING

The Group strives for continuous improvement and has established the following targets and goals for the near future:

- Evaluating and implementing low-cost measures, capital improvements and new technologies to improve the performance of related investment projects;
- Providing trainings, including ESG issues and self-development to employees; and
- Disclosing the Group's ESG approach to suppliers and other business partners to enhance the communication within all the parties.

### 環境、社會及管治的使命及展望 (續)

隨著本集團業務及影響力於中國內地積極擴充，預期其業務可於人口網絡及專業知識方面可予延伸。本集團相信此合作將為本集團未來發展帶來龐大利益，及推動其知識產權授權業務及數碼化市場推廣。儘管該決定屬策略性措施，惟本集團相信透過擴展中國內地知識產權業務，憑藉本集團自身知識及專業知識，可為營運業務更強大更標準化的知識產權市場作出貢獻。此外，本集團認為，該擴張具有更廣泛社會影響。於資訊年代，更多人士了解到知識產權的重要性及更關注數碼化市場推廣。就此，這將有助將中國內地的傳統知識產權及數碼化知識產權的潛在侵權降至最低。

### 持續改善及監察

本集團致力持續作出改善，並為不久將來制訂以下目標：

- 評估及實施低成本措施、資本改善及新技術，以改善相關投資項目的表現；
- 為僱員提供培訓，包括環境、社會及管治議題及自我發展；及
- 向供應商及其他業務合作夥伴披露本集團的環境、社會及管治方法，以提升各方的溝通。

# THE GROUP'S COMMITMENT ON ESG

## 本集團於環境、社會及管治的承擔

### CONTINUOUS IMPROVEMENT AND MONITORING (Continued)

The management team is responsible for monitoring the Group's ESG related performance and reporting to the Board when necessary. The following means are used for monitoring:

- Referring to previous years' assessments, the Group's annual reports and ESG reports on environmental protection, social responsibility and corporate governance;
  - Linking the relevant matters that significantly affect the operation of the Group in the ESG aspects; and
  - Identifying any significant risks in respect of the Group's impact on health, safety, environment and society issues.
- 提述有關環境保護、社會責任及企業管治方面的過往年度評估、本集團年報以及環境、社會及管治報告；
  - 將對本集團營運有重大影響的環境、社會及管治方面相關事宜連繫；及
  - 識別對本集團於健康、安全、環境及社會議題方面的影響的任何重大風險。

### 持續改善及監察(續)

管理層團隊負責監察本集團環境、社會及管治相關表現，並在必要時向董事會報告。以下為用於監察的方法：



## A1. Emissions

As a non-manufacturing company, the Group and its daily operations generate little negative impacts on natural environment. The Group does not produce wastewater, exhaust gas and hazardous waste emissions in daily operations. Direct and indirect environmental impacts generate by the Group are mainly from the following activities: 1) consumption of gasoline (for Group-owned vehicles) and purchased electricity; and 2) business air travel.

The Group strictly abides by laws, rules and regulations enforced by the PRC, Hong Kong, and Macau in relation to environmental protection and pollution control, including but not limited to the followings:

- Environmental Protection Law of the PRC;
- Energy Conservation Law of the PRC.

No cases of material non-compliance with relevant laws and regulations that have a significant impact on the Group relating to air and greenhouse gas (GHG) emissions, discharges into water and land, and generation of hazardous and non-hazardous waste was recorded during the Reporting Period.

## A1. 排放

作為一間非製造業公司，本集團及其日常營運對自然環境產生的負面影響甚微。本集團於日常營運中並無產生廢水、廢氣和有害廢棄物排放。本集團產生的直接及間接環境影響主要來自以下活動：1) 消耗汽油(本集團擁有的車輛)及採購電力；及2) 商務航空差旅。

本集團嚴格遵守中國、香港及澳門在環境保護及污染控制方面所執行的法律、規例及法規，包括但不限於以下各項：

- 中國環境保護法；
- 中國節約能源法。

於報告期間，概無錄得空氣及溫室氣體排放、向水及土地的排污，以及產生有害及無害廢棄物有關及對本集團重大影響的相關法律及法規的重大違反事項。



### A1. Emissions (Continued)

#### A1.1 Air Emissions

During the Reporting Period, passenger cars operated on gasoline have been used for daily transportation. Their combustion generated several air emissions including nitrogen oxides ("NO<sub>x</sub>"), sulphur oxides ("SO<sub>x</sub>") and respiratory suspended particles ("PM").

#### Mobile fuel source 汽車燃料來源

### A1. 排放(續)

#### A1.1 空氣排放

於報告期間，使用汽油的私家車乃用於日常交通，而燃燒汽油產生若干廢氣排放，包括氮氧化物(「NO<sub>x</sub>」)、硫氧化物(「SO<sub>x</sub>」)及可吸入懸浮粒子(「PM」)。

#### Air emissions (non-GHG) from the vehicle 汽車產生的廢氣排放(非溫室氣體)

	SO <sub>x</sub> (kg) 硫氧化物(千克)	NO <sub>x</sub> (kg) 氮氧化物(千克)	PM (kg) 懸浮粒子(千克)
Gasoline 汽油	0.06	1.43	0.17

Note: Emission factors for calculations on environmental parameters throughout the report were made reference to Appendix 27 of the Main Board Listing Rules and their referred documentation as set out by HKex, unless stated otherwise.

附註：除文義另有所指外，整份報告中有關環境參數計算的排放系數乃參考港交所所述的主板上市規則附錄27及其載列的參考文件。

## A1. Emissions (Continued)

### A1.2 Greenhouse Gas (“GHG”) Emissions

There were 72.94 tonnes of GHG emitted in the Reporting Period, reported in tonnes carbon dioxide equivalent (CO<sub>2eq</sub>). The GHG reported included the following activities and scope:

- Direct (scope 1) GHG emissions from the combustion of fuels for mobile transportation;
- Energy Indirect (scope 2) GHG emissions from purchased electricity; and
- Other Indirect (scope 3) GHG emissions from business air travel and waste disposal by the Group.

## A1. 排放(續)

### A1.2 溫室氣體(「溫室氣體」)排放

於報告期間，以二氧化碳當量(CO<sub>2eq</sub>)報告之溫室氣體的排放量為72.94噸。已報告之溫室氣體包括以下活動及範圍：

- 直接(範圍1)就交通工具燃燒燃料產生的溫室氣體排放量；
- 能源間接(範圍2)由採購電力產生的溫室氣體排放量；
- 其他間接(範圍3)乃本集團商務航空差旅及處置廢棄物產生的溫室氣體。

### A1. Emissions (Continued)

#### A1.2 Greenhouse Gas ("GHG") Emissions (Continued)

Activity	GHG Emission (in tonnes CO <sub>2eq.</sub> ) 溫室氣體排放量 (以噸計 二氧化碳當量)	GHG emission (in percentage %) 溫室氣體 排放量 (以 % 計)
活動		
Scope 1 Direct GHG emission 範圍1 直接溫室氣體排放量		
Gasoline 汽油	10.12	
<b>Scope 1 total</b> <b>範圍1 總計</b>	<b>10.12</b>	<b>14%</b>
Scope 2 Indirect GHG emission from purchased electricity 範圍2 採購電力產生的間接溫室氣體排放量		
Purchased electricity <sup>Note</sup> 購買電力 <sup>附註</sup>	48.12	
<b>Scope 2 total</b> <b>範圍2 總計</b>	<b>48.12</b>	<b>66%</b>
Scope 3 Indirect GHG emission 範圍3 間接溫室氣體排放量		
Business air travel 商務航空差旅	11.64	
Paper waste disposed at landfills 於堆填區處置的紙張廢物	3.06	
<b>Scope 3 total</b> <b>範圍3 總計</b>	<b>14.70</b>	<b>20%</b>
<b>Total GHG EMISSION</b> <b>溫室氣體總排放量</b>	<b>72.94</b>	<b>100.00%</b>

Note: The electricity consumption in Luoding office and Macau office was not included due to its insignificant consumption. Emission factors for purchased electricity in Admiralty, Tsuen Wan, Beijing, and Guangzhou were obtained from Hong Kong Electric (HKE), CLP Power Hong Kong Limited (CLP), China Northern Power Grid, and China Southern Power Grid respectively.

附註：於羅定辦公室及澳門辦公室耗用的電力不包括在內，原因為其耗量甚微。金鐘、荃灣、北京及廣州購買電力的排放因素分別取自香港電燈(港燈)、中華電力有限公司(中電)、中國北方電網及中國南方電網。

## A1. Emissions (Continued)

### A1.3 Hazardous Waste

The Group's business did not involve the generation of significant hazardous waste, hence no data on hazardous waste is being presented in this report. Waste electronic and electrical equipment were collected by licensed handlers for proper recycling or treatment before disposal.

### A1.4 Non-hazardous Waste

Non-hazardous waste generated by the Group's business operation during the Reporting Period included waste office paper and general office waste. An approximate total of 0.64 tonnes of waste office paper was generated during the Reporting Period.

### A1.5 Measures to Mitigate Emissions

To reduce indirect emissions from business air travel, the Group encourages electronic communications with business partners and keeps tracks of employees' business travels and their relative carbon emission. Applications for business air travel shall be reviewed and approved by management. Employees are only allowed to travel on economy class unless for special circumstances. In addition, the Group also encourages employees to take public transportations for daily commuting.

## A1. 排放(續)

### A1.3 有害廢棄物

本集團的業務並不涉及產生重大有害廢棄物，因此本報告並無提供有關有害廢棄物的數據。廢棄電子及電氣設備由持牌處理商收集，以便在處置前進行適當的回收或處理。

### A1.4 無害廢棄物

於報告期間，本集團業務營運產生的無害廢棄物包括辦公室廢紙及一般辦公室廢棄物。於報告期間，本集團產生的辦公室廢紙總數約為0.64噸。

### A1.5 減排措施

為減少商務航空差旅的間接排放，本集團鼓勵與業務夥伴進行電子通訊，並記錄僱員的商務差旅及其相關碳排放。商務航空差旅申請應由管理層審核及批准。除特別情況外，僱員差旅僅乘坐經濟艙。此外，本集團亦鼓勵僱員就日常上下班乘搭公共交通工具。

### A1. Emissions (Continued)

#### A1.6 Wastes Handling and Reduction Initiatives

The Group provides recycling bins with clear instructions for recyclable wastes. When disposing of hazardous electronic wastes, the Group follows relevant regulations in the PRC, Hong Kong, and Macau, such as the Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste.

Used office paper is collected and reused for internal document printing when suitable. Office supplies such as staplers, hole puncher and stamps are shared by staff. File folders and binders are also shared and reused internally. Obsolete stock (such as old comic books, unsold and recalled books) are stored in the Group's warehouse. After a certain length of time, the obsolete stock in inventory are collected by licensed recyclers.

### A1. 排放(續)

#### A1.6 廢棄物處理及減廢措施

就可回收廢棄物而言，本集團提供具清晰指示的回收箱。處理有害電子廢棄物時，本集團遵守中國、香港及澳門的相關法規，例如中國固體廢物污染環境防治法。

於適用時，收集及重用已使用的辦公室紙張作打印內部文件之用。員工共用辦公用具，包括釘書機、打孔機及印章。於內部分享及重用文件夾及活頁夾。陳舊存貨(例如往期漫畫書、未售出及回收書籍)存放於本集團的倉庫。於存放一段時間後，有關陳舊存貨經持牌回收商收集。



## A1. Emissions (Continued)

### *Paper Use Efficiency Initiatives*

Creating a paperless working environment not only reduces environmental damage but also fits commercial goals, as it can save physical space, facilitate information sharing via IT networks, and reduce complicated documentation procedures. The printers are in batch mode as it can minimize energy consumption due to less frequent starting. The Group suggests the employee to use the "Print Preview" function to check the layout of document and adjust the margins and font size of documents before printing in order to optimize use of paper. Moreover, duplex printing and copying and using recycle paper printing has become the norm within the Group, greatly reducing paper consumption and saving costs.

The Group has promoted electronic communication, both internally and with business partners, this resulted in reduced number of business traveling and reduced paper consumption.

The Group strongly recommends shareholders to access its corporate communications, including financial reports, through the websites of HKex and the Company, instead of printed form. By introducing electronic means in corporate communications to shareholders, the quantity of printed materials has been considerably reduced. This paperless practice thus helps to protect the environment, as well as save costs on stationery, printing and administrative charges etc. A majority of individual shareholders access financial reports and other Company documents via electronic means.

## A1. 排放(續)

### *用紙效益措施*

建立無紙工作環境可節省物理空間、促進透過資訊科技網絡的資訊分享及減少繁複的文書程序，不僅減低環境損害，更符合商業目的。印刷按批量模式進行以減少啟動機器頻率，因而減低能源消耗。本集團建議員工在印刷前使用「印刷預覽」功能檢查文件版面配置，並調整文件邊界及字型大小，從而優化用紙。此外，雙面印刷及複印以及使用回收紙進行打印已成為本集團之常規做法，大大減少紙張耗用、節約成本。

本集團已在集團內部及向業務夥伴推廣電子通訊，以減少差旅次數及節省用紙。

本集團強烈建議股東透過港交所及本公司網站取得財務報告等企業通訊，以取代印刷本。透過向股東介紹電子版本之企業通訊，印刷量獲大幅減少。此無紙措施因此有助保護環境，同時節省文具、印刷及行政開支等成本。大部分個人股東透過電子方式取得財務報告及其他公司文件。



### A2. Use of Resources

The Group has started establishing formal policies on the efficient use of resources, it is committed to encouraging employees to observe resource conservation practices.

#### A2.1 Energy Consumption

The Group mainly consumed purchased electricity for the offices and warehouse, as well as gasoline for vehicles. As of 31 March 2019, a total of 80,250 kWh electricity consumption was recorded. The intensity data was not presented due to unavailability of electricity data from the Macau office and Luoding office. The consumption of gasoline was converted to kWh unit, resulting in a total energy consumption of 113,515 kWh during the Reporting Period.

Energy Consumption Sources 能源消耗來源	Consumption (in individual unit) 消耗量 (按自有單位)	Consumption (in kWh) 消耗量 (千瓦時)
Purchased Electricity 購買電力	80,250 kWh 80,250 千瓦時	80,250
Gasoline 汽油	3,754 Litres 3,754 升	33,265
<b>Total</b> 總計		<b>113,515</b>

Note: Conversion factors were made reference to the IEA Energy Statistics Manual and 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

附註：換算系數乃參考國際能源署能源統計手冊及二零零六年IPCC國家溫室氣體清單指南。

### A2. 資源使用

本集團已開始制訂有效使用資源的正式政策，並致力於鼓勵僱員遵守資源保護措施。

#### A2.1 能源消耗

本集團主要於辦公室及倉庫消耗購買電力，而汽車則消耗汽油。於二零一九年三月三十一日，已錄得總用電量為80,250千瓦時。由於澳門辦公室及羅定辦公室並無提供電力數據，故並無呈列密度數據。於報告期間，汽油消耗量轉為以千瓦時為單位，因此總能源消耗量為113,515千瓦時。

## A2. Use of Resources (Continued)

### A2.2 Water Consumption

The water consumption for various offices was centrally managed by the property management offices of the premises and the Group did not have control over the water consumption or any relevant water-saving initiatives.

### A2.3 Energy Use Efficiency Initiatives

The Group is actively establishing and promoting energy-saving initiatives in office buildings and warehouse. Employees at offices are advised to set air conditioning at temperatures between 24°C to 26°C for energy-saving purposes. For unoccupied rooms, air conditioning must be turned off. When there are few people working in office, the non-essential lighting are switched off. Office lights, air conditioners, printers and computers are turned off when all staff leave the offices. Refrigerators achieve high energy efficiency (Level 1 on Energy Label). Drinking water dispensers are set with timer for auto shutdown of heating after office hours. In Hong Kong offices, water dispensers are certified by the Hong Kong Electrical and Mechanical Services Department ("EMSD") electricity consumption rating.

Moreover, the Group encourages the employees to take public transportations for commuting, and business traveling are controlled in terms of necessity to minimize the use of energy. The Group also encourages the employees to follow the dress code of smart casual on weekdays, and casual wear is allowed on Friday, resulting in the reduced reliance on air conditioning consumption.

## A2. 資源使用(續)

### A2.2 耗水量

各辦事處耗水量由物業管理處統一管理，而本集團並無控制耗水量或任何相關節水措施。

### A2.3 節約能源措施

本集團積極建立及推廣辦公室樓宇及倉庫節能措施，建議辦公室僱員將空調設置於攝氏24度至26度範圍之內，以達致節能目的。閒置房間必須關閉空調。當在辦公室員工較少時，會關上不必要的照明。當所有員工離開辦公室時，會關上辦公室電燈、空調、打印機及電腦。雪櫃達致高能源效益（一級能源標籤）。飲水機配有計時器，可於辦公時間後將加熱功能自動關閉。於香港辦公室，飲水機已通過香港機電工程署（「機電工程署」）的電力消耗評級。

此外，本集團鼓勵僱員上下班乘坐公共交通工具，並於必要時方進行商務差旅行，以盡量減少能源使用。本集團亦鼓勵僱員於平日遵守穿著時尚休閒裝，並於星期五可穿著休閒裝，減少對使用空調的依賴。

## A2. Use of Resources (Continued)

### A2.4 Water Use Efficiency Initiatives

The Group's business does not involve heavy use of water. When applicable, water is recycled for watering indoor plants.

### A2.5 Packaging Materials

Printed books are one of the main products of the Group. Plastic covers are used for book packaging in contracted printer factories. The Group encourages the printer factories to properly plan the use of raw materials and packaging materials, like degradable plastic material, so to improve the economic and environmental benefits to the greatest extent while effectively reducing the cost of production and packaging. Due to insignificant amount of plastic cover consumption, it was not quantitatively recorded.

## A2. 資源使用(續)

### A2.4 節約用水措施

本集團業務並不涉及大量用水。倘適用，本集團會將水再循環用於灌溉室內植物。

### A2.5 包裝材料

印刷本為本集團主要產品之一。我們於合約印刷工廠中使用塑膠套包裝圖書。本集團鼓勵印刷工廠妥善規劃使用原材料及包裝材料(如可分解塑膠物料)，以最大程度提高經濟及環保效益，同時有效降低生產及包裝成本。由於塑膠套使用量甚少，故並無記錄其數量。

## A3. The Environment and Natural Resources

### A3.1 Significant Impacts of Activities on the Environment

The Group's operations did not cause any significant adverse impacts on the environment and natural resources. The Group continuously monitors its air emission, wastewater discharge, and noise level to ensure minimum impacts on the surrounding environment and creation of a healthy environment for its workers. The Group did not receive any complaints from the surrounding communities regarding air pollution, odor, noise, or night light pollution.

## A3. 環境及天然資源

### A3.1 業務活動對環境的重大影響

本集團的業務並無對環境及天然資源造成任何重大不利影響。本集團持續監控其廢氣排放、廢水排放及噪音水平，以確保對周邊環境影響降至最低，並為僱員創造健康環境。本集團並無自周邊社區接獲任何對空氣污染、氣味、噪音或夜間光污染的投訴。

## 1. Employment and Labour Practices

### B1. Employment

The Group stringently complies with national and local laws and regulations concerning employment and labour practices, including but not limited to the followings:

- The Employment Ordinance of the Laws of Hong Kong;
- The Sex Discrimination Ordinance of the Laws of Hong Kong;
- The Disability Discrimination Ordinance of the Laws of Hong Kong;
- The Race Discrimination Ordinance of the Laws of Hong Kong;
- Labour Law of the PRC;
- Labour Contract Law of the PRC;
- Law of the PRC on the Protection of Rights and Interests of Women;
- Law of the PRC on the Protection of Minors;
- Law of the PRC on the Protection of Disabled Persons; and
- Social insurance Law of the PRC.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare had been identified during the Reporting Period.

## 1. 僱傭及勞工常規

### B1. 僱傭

本集團嚴格遵守有關僱傭及勞工常規的國家及地方法律法規，包括但不限於以下各項：

- 香港僱傭條例；
- 香港性別歧視條例；
- 香港殘疾歧視條例；
- 香港種族歧視條例；
- 中國勞動法；
- 中國勞動合同法；
- 中國婦女權益保障法；
- 中國未成年人保護法；
- 中國殘疾人保障法；及
- 中國社會保險法。

於報告期間，並無發現違反有關補償及解僱、招聘及晉升、工時、假期、平等機會、多元化、反歧視及其他福利而對本集團有重大影響的相關法律及法規。

## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

The Employee's Handbook continues to serve as the guideline and working procedure to manage employment and labour-related practices.

At the end of this Reporting Period, the Group had a total of 99 employees for its Admiralty office, Tsuen Wan office, Tsuen Wan warehouse, Macau office, Luoding office, Beijing office, and Guangzhou office. All are full-time employees.

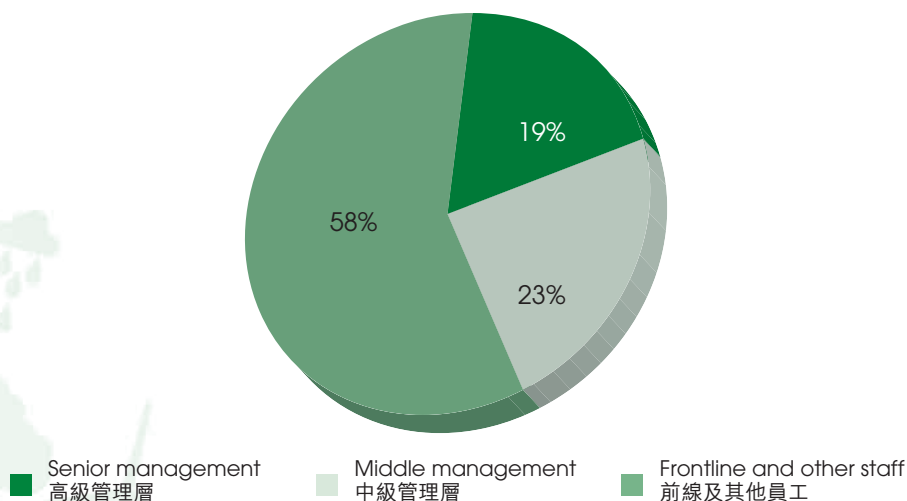
## 1. 僱傭及勞工常規(續)

### B1. 僱傭(續)

員工手冊作為管理僱傭及與勞工相關常規的指引及工作流程。

於本報告期間末，本集團的金鐘辦公室、荃灣辦公室、荃灣倉庫、澳門辦公室、羅定辦公室、北京辦公室及廣州辦公室共有99名僱員。全體均為全職僱員。

**Total Workforce (%) by Employee Category**  
按僱傭類別劃分的僱員總數(%)

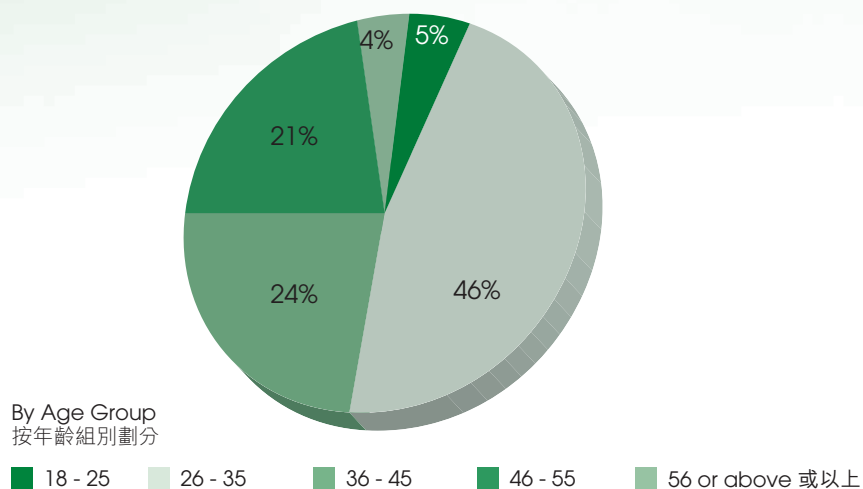




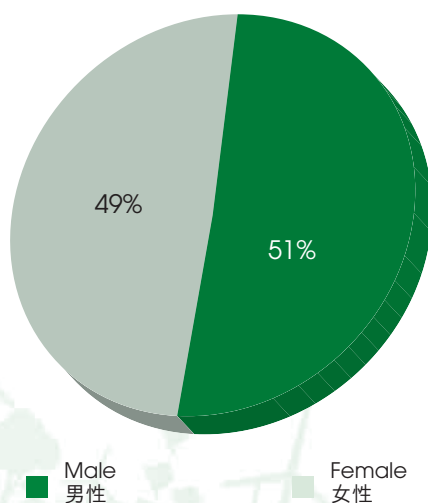
## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

**Total Workforce (%) by Age Group**  
按年齡組別劃分的僱員總數(%)



**Total Workforce (%) by Gender**  
按性別劃分的僱員總數(%)

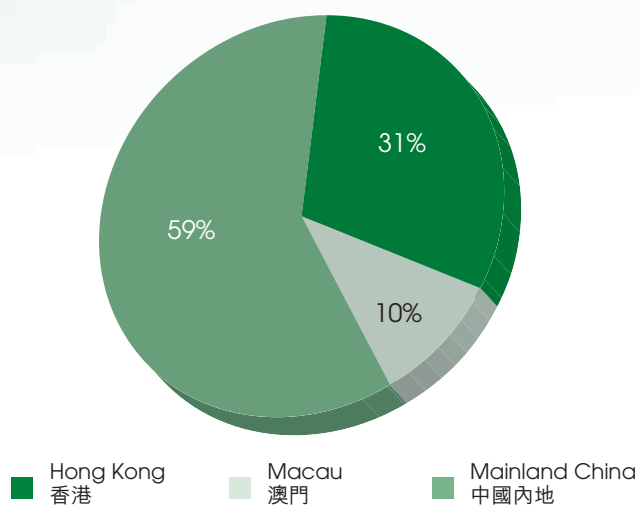




## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

Total Workforce (%) by Geographical Region  
按地區劃分的僱員總數(%)



## 1. 僱傭及勞工常規(續)

### B1. 僱傭(續)

## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### *Compensation, Allowance, and Benefits*

Apart from stringently following applicable laws and regulations, the Group strives to adopt best industrial practices by providing various benefits to employees. For examples, all employees are covered under the Group's medical scheme. Labour insurance is also provided to employees upon completion of probation, and employees are subject to personal accident insurances. Other benefits include dental scheme, retirement benefit, staff discount, welfare fund, and long service award.

The Group offers various compensation and allowance including overtime compensation, annual bonus, housing allowance, meal allowance, travel allowance, and standby allowance. Welfare Fund serves to enrich employees' leisure life and to enhance their team spirit for departments to organize recreational, social and other celebratory activities. In addition, it can be used to provide relief in the form of loans to employees in need of financial assistance.

## 1. 僱傭及勞工常規(續)

### B1. 僱傭(續)

#### *補償、津貼及待遇*

除嚴格遵守適用法律及法規外，本集團致力採納最佳行業慣例，為僱員提供各種福利。例如，全體僱員均受本集團醫療計劃保障。於試用期結束後，僱員亦可獲得勞工保險，及僱員可享個人意外保險。其他待遇包括牙科計劃、退休福利、員工折扣、福利基金及長期服務獎勵。

本集團提供各種補償及津貼，包括超時工作補貼、年度花紅、房屋津貼、膳食津貼、差旅津貼及候命津貼。福利基金透過向部門提供康樂、社交及其他慶祝活動，豐富僱員休閒生活及增強團隊精神。此外，其可用於向需要財務援助的僱員提供貸款形式的援助。

## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### *Recruitment and Dismissal*

The recruitment procedure is guided by relevant laws and regulations such as Labour Law of the PRC and the Employment Ordinance of the Laws of Hong Kong. There is no discrimination among the Group's policies during recruitment. All posts are filled based on objective criteria including professional qualifications and skill sets needed for the posts.

Termination of contract of employment shall be made in writing by either party subject to established rules, either by notice or without advance notice. An employee may be summarily dismissed without advance notice or payment in lieu of notice if the employee in relation to his/her employment, 1) willfully disobeys a lawful and reasonable order; or 2) misconducts himself/herself; or 3) is guilty of fraud or dishonesty; or 4) habitually neglects his/her duties; or 5) on any other grounds on which the Group would be entitled to terminate the contract of employment.

## 1. 僱傭及勞工常規(續)

### B1. 僱傭(續)

#### *招聘及解僱*

招聘程序以相關法律及法規作指引，例如中國勞動法和香港僱傭條例。於招聘期間，本集團政策並不存在歧視。所有職位均根據客觀標準填補，包括職位所需的專業資格及技能組合。

無論有否事先通知，終止僱傭合約應由任何一方按照既定規則以書面形式提出。倘僱員與其工作有關而，1)故意違反合法合理的命令；或2)其行為失當；或3)欺詐或不誠實行為；或4)習慣性疏忽職守；或5)任何本集團有權終止僱傭合約而恕不另行通知的其他理由，僱員可於並無事先通知或代通知金的情況下立即被解僱。

## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### *Evaluation and Appraisal System*

Performance appraisal is conducted annually. Employees are promoted on the basis of their performance in the current jobs and the extent to which they demonstrate the attributes required for a higher grade.

#### *Equal Opportunity*

The Group has constructed a formal Policy on Equal Employment Opportunities. Equal opportunities are offered to candidates and employees during recruitment, internal transfer and promotion, on the grounds of equality on gender, nationality, marital status, disability and religious belief. Any employee is entitled to the same benefits and treatment being offered and applied to any other employees.

#### *Turnover*

A total number of 6 employees left the Group during the Reporting Period, resulting in a turnover rate of approximately 6%.

## 1. 僱傭及勞工常規(續)

### B1. 僱傭(續)

#### *評估及評核系統*

表現評估於每年進行。僱員的晉升乃基於彼等於現時工作上的表現及彼等展示所需更高學歷的程度為基準。

#### *平等機會*

本集團已制定有關平等僱傭機會的正式政策。不論候選人及僱員的性別、國籍、婚姻狀況、殘疾及宗教信仰，彼等在聘用、內部調任及晉升方面享有平等機會。任何僱員有權獲得與任何其他僱員相同的福利及待遇。

#### *流失率*

於報告期間，本集團合共有6名僱員離任，流失率約為6%。

## 1. Employment and Labour Practices (Continued)

### B2. Employee Health and Safety

The Group strictly complies with all applicable laws and regulations in relation to occupational health and safety (“OHS”), including but not limited to the Law of the PRC on the Prevention and Control of Occupational Diseases, the Occupational Safety & Health Ordinance of the Laws of Hong Kong, and Employees’ Compensation Ordinance of the Laws of Hong Kong. The internal Health & Safety Policy guides the daily OHS management, including workplace safety, fire safety, adverse weather arrangement, etc.

During the Reporting Period, the Group updated the Safety and Health Handbook, which is designed to introduce to the staff of the Group policies and measures adopted for work safety and health. Workplace safety is of high priority. The management must ensure that the employees are familiar with and observe all the safety rules in order to guarantee the work safety of employees.

## 1. 僱傭及勞工常規(續)

### B2. 僱員的健康與安全

本集團嚴格遵守有關職業健康與安全(「職安健」)的所有適用法律及法規，包括但不限於中國職業病防治法、香港職業安全及健康條例及香港僱員補償條例。內部健康與安全政策指導日常職安健管理，包括工作場所安全、消防安全及惡劣天氣安排等。

於報告期間，本集團已更新安全與健康手冊，旨在向員工介紹本集團為保障工作安全而採取的政策及措施。工作場所安全至為重要，故管理層必須確保僱員熟悉並遵守所有安全規則，以確保僱員的工作安全。

## 1. Employment and Labour Practices (Continued)

### B2. Employee Health and Safety (Continued)

Each employee should observe the importance of work safety in order to protect themselves from unnecessary accidents and injuries. It is the duty of every employee to take reasonable care for the health and safety of himself or herself and other persons (colleagues and guests) who may be affected by his or her acts or omissions at work.

Ergonomic office furniture has been provided to employees for maximum comfort and fatigue reduction, allowing repetitive tasks to be performed without a significant increase in Musculoskeletal Disorders (MSD) risk.

No work-related fatality or injury cases was reported during the Reporting Period. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to providing a safe working environment and protecting employees from occupational hazards can be identified during the Reporting Period.

## 1. 僱傭及勞工常規(續)

### B2. 僱員的健康與安全(續)

每名僱員須注意工作安全的重要性，以保障自己免受不必要事故及傷害。每名僱員均有責任合理關注其自身及可能受其工作或疏忽影響的他人(同事及客戶)的健康及安全。

我們已向僱員提供符合人體工學的辦公傢俱以令其獲得最大程度的舒適度，減少工作疲勞並在免受肌肉骨骼疾病風險大幅增加的情況下進行重複工作。

於報告期間，概無與工作相關的死亡或受傷情況報告。於報告期間，概無不遵守與提供安全工作環境及保障僱員免受職業危害相關且對本集團有重大影響的法律及法規。



## 1. Employment and Labour Practices (Continued)

### B3. Development and Training

The Group has established a formal Training & Development policy, specifying training policies, new employee orientation, education allowance and professional trainings. A wide range of training courses have been provided to employees of all levels. For example, all new employees are required to attend an orientation program within the first week of employment. The program will provide information on the following:

- the organization structure and mission of the Group;
- the employee's role in contributing to business success and objectives;
- different departments, through a guided tour around the office;
- the inter-relationship between the employee's own department and other departments; and
- office procedures.

## 1. 僱傭及勞工常規(續)

### B3. 發展及培訓

本集團已制定正式培訓及發展政策，指明培訓政策、新僱員入職培訓、教育津貼及專業培訓。本集團為各級僱員提供廣泛培訓課程。例如，所有新僱員於獲聘首星期內均須參加入職培訓計劃。該計劃將提供以下資料：

- 本集團的組織結構及使命；
- 僱員於促進業務成功及目標方面的角色；
- 透過辦公室導遊遊覽參觀不同的部門；
- 僱員本身部門與其他部門之間的相互關係；及
- 辦公室程序。

## 1. Employment and Labour Practices (Continued)

### B3. Development and Training (Continued)

The Group encourages self-development of employees through attending external training programs and seminars. Permanent employees who have completed one year of service can apply for the sponsorship for external training programs relevant to their jobs. Prior approval from their department heads is required and employees will be reimbursed of the program fees upon their completion of the related courses with passing grades or satisfactory attendance. Employees taking examinations for acquiring professional qualifications relevant to their jobs can apply for reimbursement of the examination fees from the Group.

## 1. 僱傭及勞工常規(續)

### B3. 發展及培訓(續)

本集團鼓勵員工透過參加外部培訓課程及研討會自我發展。完成一年服務的永久僱員可以就與其工作相關的外部培訓計劃申請資助。須事先獲得部門負責人批准，並於完成相關課程後，將通過成績或出席率達滿意後向僱員付還課程費用。參加考試以獲得與其工作相關的專業資格的僱員可向本集團申請付還考試費用。

## 1. Employment and Labour Practices (Continued)

### B4. Labour Standards

The Human Resources Department continues to implement comprehensive checking system during the recruitment process to ensure compliance with all the applicable laws regarding employment and labour standards, such as the Employment Ordinance of the Laws of Hong Kong and Provisions on the Prohibition of Using Child Labour of the PRC.

The Group strictly forbids any forms of workplace harassment. Upon finding or encountering any suspicious actions, employees can make a complaint to the Human Resources Department who will investigate the case thoroughly and confidentially in accordance with the guidelines in handling harassment complaints.

The Group will take appropriate disciplinary action against anyone who is in breach of any applicable laws, regulations, and ordinance. No non-compliance with relevant laws and regulations relating to preventing child and forced labour had been identified during the Reporting Period.

## 1. 僱傭及勞工常規(續)

### B4. 勞工準則

於招聘過程中，人力資源部繼續實施全面檢查制度，以確保遵守有關僱傭及勞工準則的所有適用法律，例如香港法例項下的僱傭條例及中國禁止使用童工規定。

本集團嚴禁任何形式的職場騷擾。於發現或遇上任何可疑行為，僱員可向人力資源部投訴，而人力資源部將根據有關處理職場騷擾投訴的指引進行徹底及保密地調查。

本集團將對違反任何適用法律、法規及條例的任何人士採取適當紀律處分。於報告期間，本集團並無發現任何不遵守對有關防止童工及強迫勞動的相關法律及法規的情況。

## 2. Operating Practices

### B5. Supply Chain Management

Supply chain management is a key part of a sustainable business strategy. It covers management of all significant environmental and social impacts from supply chain of the Group throughout the life-cycles of products or services.

The Group has established a guidance on Environmental Supply Chain Management to manage suppliers. The first thing to do is to conduct dialogue and collaboration with suppliers and sub-contractors on continuous improvements of the environmental performance of products and services to achieve the following missions for both sides:

- Improve business and public image;
- Reduce risk of legal non-compliance;
- Improve productivity and efficiency;
- Reduce number of defaults; and
- Improve environmental management.

## 2. 營運常規

### B5 供應鏈管理

供應鏈管理為可持續業務戰略之關鍵部分。其涵蓋整個產品或服務週期內來自供應鏈的所有重大環境及社會影響之管理。

本集團已設立環境供應鏈管理指引以管理供應商。首先須與供應商及分包商就產品及服務的環境表現的持續改善進行對話及合作，從而為雙方完成下列任務：

- 提升業務及公共形象；
- 減少違法風險；
- 提高生產力及效率；
- 減少違約數量；及
- 提升環境管理。

## 2. Operating Practices (Continued)

### B5. Supply Chain Management (Continued)

The guidance also provides procedures for monitoring and evaluation:

- Update the guidance if needed;
- Keep track of guidance implementation progress of suppliers and sub-contractors; and
- Review environmental status of suppliers and sub-contractors.

### B6. Product Responsibility

#### *Product Labelling, Health and Safety, and Advertising*

For any marketing and promotional activities, the Group ensures that relevant activities are in compliance with applicable laws and regulations such as the Advertisement Law of the PRC. No false nor misleading contents shall be contained in any advertisement. During the Reporting Period, the Group did not record any cases of material non-compliance with laws and regulations regarding health and safety, advertising, labelling and privacy matters relating to products and services provided.

## 2. 營運常規(續)

### B5 供應鏈管理(續)

指引亦提供監察及評估程序：

- 更新指引(倘需要)；
- 持續留意供應商及分包商之指引實施進度；及
- 審閱供應商及分包商之環境狀態。

### B6 產品責任

#### *產品標籤、健康及安全以及廣告*

就任何市場營銷及推廣活動而言，本集團確保相關活動符合適用法律及法規(如中國廣告法)。並無錯誤或具誤導性的內容將載入任何廣告中。於報告期間內，本集團並無錄得涉及與所提供的產品及服務有關的健康及安全、廣告、標籤及隱私事項之任何重大違法違規事件。



## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### *Quality Assurance*

The Group's Quality Assurance policy requires that comic books and products have to be inspected by the Comics Department before entering into production. Furthermore, a fixed amount of samples are kept in the Group's inventory, including but not limited to products, comic books and manuscripts. The Group has received no product-related or service-related complaints during the Reporting Period.

#### *Intellectual Property*

The Intellectual Property Policy was rigorously followed during the Reporting Period, and the Group's designated IP Team continues to work together with the Secretary and Legal Team to manage IP rights. The Group follows similar practices as the previous Reporting Periods relating to the protection of IP rights, the process of IP authorization and licensing, and any infringement case. The IP Team conducts routine monitoring and assessments and reports to various departments. Publishing materials, products and productions are only licensed upon verifications of the licensee and upon approval of formal agreements with the Group's Legal Team.

## 2. 營運常規(續)

### B6 產品責任(續)

#### *品質保證*

本集團的品質保證政策規定，漫畫書籍及產品於投產前須由漫畫部檢查。此外，本集團存置固定數量的樣本，包括但不限於產品、漫畫書及手稿。本集團於報告期間並無收到任何與產品或服務有關的投訴。

#### *知識產權*

本集團於報告期間嚴格遵守知識產權政策，而本集團指定的知識產權團隊將繼續與秘書及法律團隊聯手管理知識產權。本集團就保障知識產權、知識產權許可與授權過程以及任何侵權情況採用與過往報告期間相類似的做法。知識產權團隊進行例行監察及評估，並向多個部門作出報告。出版材料、產品及製作僅於本集團的法律團隊在核證授權及正式協議批准後方獲授權。

## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Intellectual Property (Continued)

As of March 31, 2019, over 200 Comic Titles have been actively listed under the Group's IP portfolio. Various active Trademarks have been registered within various regions, including Hong Kong, USA, and the PRC. The group's domain name (culturecom.com.hk) was also kept active.

#### Data Protection

Regarded by stakeholders as the most material issue, data privacy of consumers, customers, and suppliers is strictly protected by the Group. All data provided by employees during and after the engagement process is kept confidential.

To preserve the confidentiality of customer personal data, the Group maintains the following data privacy principles:

- Only collect personal data that is believed to be relevant and required to conduct the normal course of business;
- Do not disclose any customer personal data unless the Group has expressly informed that person or has that person's consent, or it is required by law;

## 2. 營運常規(續)

### B6 產品責任(續)

#### 知識產權(續)

於二零一九年三月三十一日，超過200部漫畫已列為本集團的知識產權組合名下。多項商標已於多個地區(包括香港、美國及中國)獲註冊。本集團亦繼續沿用域名名稱(culturecom.com.hk)。

#### 資料保障

因由持份者視為至關重要，故消費者、客戶及供應商之資料隱私受本集團嚴格保護。聘用過程中或之後由僱員所提供之所有資料將保密。

為對客戶個人資料保密，本集團維持下列資料保密原則：

- 僅收集被認為對進行一般業務而言屬相關及必要的個人資料；
- 不得披露任何客戶個人資料，除非本集團明確告知當事人或經其同意或法律規定；

## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Data Protection (Continued)

- Do not transfer personal data to any entity without customers' consent unless it is required by law or it was previously notified to the customer; and
- Maintain robust security systems designed to prevent unauthorized access to personal data and implement various physical, electronic and management measures to safeguard and secure the personal data that the Group collected.

In addition to protect data for business partners, the Group also fully protects employees' personal data. All data supplied by the employee during and after the engagement process are kept confidential. An employee can make a written inquiry to the Group to see if the Group holds any of his/her personal data and to get the details of the data captured, if any. The employee has the right to request for an amendment to any data found incorrect.

## 2. 營運常規(續)

### B6 產品責任(續)

#### 資料保障(續)

- 未經客戶同意，不得向任何實體轉讓任何個人資料，除非法律規定或已事先通知客戶；及
- 維持健全的安全系統(該等系統被設計用於防止未經授權取得個人資料)並實施不同的實體、電子及管理措施以保障本集團收集的個人資料。

除為業務夥伴保護資料外，本集團亦充分保護僱員之個人資料。於聘用過程中或之後由僱員提供的所有資料屬機密。僱員可以書面形式向本集團詢問是否持有其任何個人資料並了解所掌握的資料之詳情(倘有)。僱員有權要求修正發現有誤的資料。

## 2. Operating Practices (Continued)

### B7. Anti-corruption

To ensure ethical business practices, the Group strictly follows the Criminal Law of the PRC, Prevention of Bribery Ordinance, and other laws, regulations and regulatory documents related to commercial bribery.

The Group forbids employees to offer, solicit or accept anything of material value to or from their colleagues, customers, suppliers or other business partners of the Group without the Group's consent. Employees are required to report to the management team through their department managers or the Human Resources Department of incidents or suspected cases of corruption, theft, fraud, embezzlement and money laundering.

Legal action will be taken immediately and be arranged by the Group's Legal Advisor in case of such incidents. Management will report to the police, the Independent Commission Against Corruption (the "ICAC"), HKex and the Securities and Futures Commission (the "SFC") if appropriate. In pursuant to the Prevention of Bribery Ordinance of the Laws of Hong Kong, there was no concluded legal case regarding corrupt practices brought against the Group or its employees during the Reporting Period.

## 2. 營運常規(續)

### B7. 反貪污

為確保商業實踐合乎道德，本集團嚴格遵守中國刑法、防止賄賂條例及其他法律、法規及與商業賄賂有關的規管文件。

本集團嚴禁僱員於未經本集團同意的情況下向或自其同事、本集團的客戶、供應商或其他業務夥伴提出要約、誘使或接受任何具實質價值的物品。僱員須透過其部門經理或人力資源部向管理層團隊報告有關或疑似貪污、盜竊、欺詐、盜用公款及洗黑錢之事件。

倘出現有關事件，本集團的法律顧問將即時採取法律行動並作出安排。管理層將於適當情況下向警署、廉政公署(「廉政公署」)、港交所以及證券及期貨事務監察委員會(「證監會」)上報。於報告期內，根據香港法例的防止賄賂條例，概無有關對本集團或其僱員提出並已審結的貪污訴訟案件。

## 2. Operating Practices (Continued)

### B7. Anti-corruption (Continued)

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to corruption, bribery, fraud and money laundering had been identified during the Reporting Period.

### B8. Community Investment

While formal policies on community engagement are yet to be established, the Group continues to put resources in public education and strives to implement corporate social responsibility and to participate in public welfare activities.

## 2. 營運常規(續)

### B7 反貪污(續)

於報告期間，在腐敗、賄賂、詐騙及洗錢方面，本集團並無確認有重大影響之違法違規情況。

### B8. 社區投資

雖然尚未訂立與社區參與有關的正式政策，本集團將繼續為公共教育投放資源並致力於履行企業社會責任及參與公共福利活動。





# CULTURECOM

文化傳信集團有限公司

(於百慕達註冊成立之有限公司)  
(股份代號：00343)

CULTURECOM HOLDINGS LIMITED  
(Incorporated in Bermuda with limited liability)  
(Stock Code : 00343)