



中国宇华教育集团有限公司

China YuHua Education Corporation Limited

(Incorporated in the Cayman Islands with limited liability)

Stock Code: 6169



Environmental, Social and Governance Report

2019



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ABOUT THE REPORT

SUMMARY

This report is the third environmental, social and governance report (the “**ESG Report**” or the “**Report**”) issued by the Group (as defined below). Unless otherwise stated, this Report should be read in conjunction with the Corporate Governance Report on pages 58 to 71 of the 2019 annual report of the Company. This Report will be published on the website of The Stock Exchange of Hong Kong Limited (the “**Stock Exchange**”) and on the Group’s website. The ESG Report will be published annually.

BASIS OF PREPARATION

This ESG Report has been prepared in accordance with the “Environmental, Social and Governance Reporting Guide” (the “**ESG Guide**”) as set out in Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Listing Rules**”)

SCOPE AND EXTENT OF THE REPORT

The data and information referred to in this Report are derived from various files, questionnaires, records, statistics and research of the Group. This Report covers the period from 1 September 2018 to 31 August 2019 (the “**Reporting Period**”), which corresponds to the financial year covered in the 2019 annual report.

The policy document, declaration and data set out in this Report cover the Company and its subsidiaries and consolidated affiliated entities (collectively, the “**Group**”).

CONTACT INFORMATION

If you have any queries or feedback about this Report and its contents, please contact us at:

- Address: 4/F, Yuhua Education Business Building, Jinhui West Street, Zhengdong New District, Zhengzhou City, Henan Province, China
- Tel.: +86 371-60673938
- Fax: +86 371-6595070
- E-mail: contact@yuhuachina.com
- Official website: <http://www.yuhuachina.com>

COMPANY PROFILE

The Group is one of the largest private education groups in China. The Group currently operates 29 schools covering pre-school education, primary education and higher education in central China and Thailand. In providing K-12 and university education services, the Group not only focuses on helping students achieve excellent academic performance, but also emphasises the overall coordinated development of “body quotient, moral intelligence quotient, emotional quotient and intelligence quotient” of students, dutifully shouldering the responsibility of nurturing social pillars.

ABOUT THE REPORT (CONTINUED)

CORE VALUE OF THE GROUP

Adhering to the core value that “the essence of education is love, the essence of love is giving, and giving is getting”, the Group adheres to the educational concept aiming at “fostering modern talent with leadership and lifelong learning capabilities and nurturing great minds to contribute to the future development of the Chinese nation” and provides students with education services that are in line with the values of the Group. At the same time, the Group’s teachers abide by the principle of “working hard, educating people with love, cultivating love with love, seeking truth with truth” to cultivate talented youth with well-rounded and coordinated development.

IDENTIFICATION AND COMMUNICATION WITH STAKEHOLDERS

While managing its schools and advancing its business affairs, the Group also pays attention to the major issues of interest to shareholders, investors, staff, students, parents, governments, regulatory authorities, and communities (“**Stakeholders**”). It opens up multiple channels of communication and, through the continuous communication with the Stakeholders, is able to develop thorough understanding of the needs of different Stakeholders and provide appropriate solutions. At the same time, the Group believes that listening to the opinions of Stakeholders will help the Group to improve its environmental, social and governance performance comprehensively and objectively so as to better address the needs of different Stakeholders.

Key Concerns of Stakeholders and the Corresponding Actions

Stakeholder	Main focus	Communication channels	Corporate/Group actions
Shareholders/ Investors	Operating strategy; Sustainable and stable return on investment; Timely information disclosure; Excellent enterprise image; and Operation of enterprise in compliance with relevant laws and regulations.	General meeting of shareholders; Information disclosure of the listed company; Roadshows/conference calls/meetings; Media communication mechanism; Enquiries via telephone/email; Investors’ on-site visit; and Website information disclosure.	Issue of notice of annual general meeting and the resolutions as required by the Listing Rules; Timely disclosure of information about the Group; Issue of announcements and regular reports as required by the Listing Rules; and Provision of smooth communication channels.
Staff	Training and career development space; Salary and welfare; Working environment; and Health and safety protection.	Direct communication; Physical examination; Staff activities; Opinions from staff; and Staff training.	Providing healthy and safe working environment; Setting up a fair promotion system; Providing staff with interactive platform; and Organising staff activities.

ABOUT THE REPORT (CONTINUED)

Stakeholder	Main focus	Communication channels	Corporate/Group actions
Students and Parents	Educational service quality; Student information protection; Student life care; Health and safety protection; Teaching quality; and Student performance.	Collection of complaints and feedback; Maintaining good communication with students; Caring for student life; Helping families suffering from difficulties; and Parents meetings.	Establishing a parent committee; Conducting student surveys; Organising student activities; Regular physical examination; Regular parents meetings; and Maintaining good communications.
Government and Regulatory authorities	Operational compliance; Tax compliance; Transparent governance; and Information disclosure and reporting materials.	Compliance with laws and regulations; Routine work report; and Information disclosure.	Strict compliance with laws and regulations; Accurate disclosure of information; Tax payment by law; and Accepting government supervision.
Community	Employment opportunities; Ecological environment; Community development; and Social commonwealth.	Community engagement.	Priority hire of local staff; Preserving the environment; and Organising community activities.
Media	Open information; and Good media relations.	Information disclosure.	Maintaining good communication; and Timely disclosure of information.

I. EMPLOYMENT AND LABOUR PRACTICES

Adhering to the teaching principle of “working hard, educating people with love, cultivating love with love, seeking truth with truth”, the Group earnestly takes the responsibility of educating people and cultivating pillars for national and social development. The Group strictly obeys relevant laws and regulations to recruit and hire teachers and staff, and has established a scientific, fair and mature talent employment mechanism and human resource management system. The Group has attached great importance to the health and safety issues of staff, teachers and students, and comprehensively guarantees a safe, stable and comfortable working and learning environment. The Group has also provided a fair and scientific career development platform for teachers and employees to enhance their professionalism and teaching ability.

EMPLOYMENT

During the recruiting and hiring process, the Group strictly obeys the *Labour Law*, the *Labour Contract Law*, the *Employment Promotion Law*, the *Education Law*, the *Teachers Law*, the *Labour Dispute Mediation and the Arbitration Law* of the People’s Republic of China (“**China**” or the “**PRC**”) and the *Labour Protection Act*, the *Labour Relations Act*, the *Social Security Act*, the *Workmen’s Compensation Act* of Thailand, as well as the local labour laws and regulations in the provinces of Henan, Hunan and Shandong of China. During the Reporting Period, the Group has complied with all applicable laws and regulations, and has not been subject to warnings, fines, and penalties for violations of laws or regulations. The Group has not violated laws and regulations related to recruitment and promotion, compensation and dismissal, working hours, holidays, equal opportunities, diversity, anti-discrimination and other benefits, as well as receiving any warnings, fines, penalties and other punitive events.

During the Reporting Period, there were no major updates on the human resource policies and related hiring procedure. The Group employs staff and carries out recruitment strictly based on the *Personnel Business Process* in the *Staff Handbook* of the Group. The Group treats every candidate fairly regardless of gender, nationality and age, and provides teachers with fair employment opportunities and a harmonious working environment. The Group starts initiating the recruitment of graduates every November by cooperating with “58.com”, “Zhaopin.com” and other well-known recruitment agencies.

In addition, the termination of labour contracts can be divided into three categories: resignation, dismissal, and natural termination of labour contract. The Group has also provided detailed guidance on the termination process in the *Personnel Business Process*. The Group has the right to dismiss employees in certain circumstances. For instance, the Group may issue the *Notice of Termination of Labour Contract* to employees who seriously violated the relevant provisions in the *Staff Handbook*. Formal employees can submit a *Resignation Report* to the head of the department for further approval 30 days in advance.

In terms of working hours, the Group has made detailed guidelines for working hours and attendance regulations in strict accordance with the *Time Management System* in the *Staff Handbook*. The Group keeps optimising the Group’s working processes and improving staff working efficiency. In the meantime, the attendance record is used as one of the important standards for staff assessment, promotion and transfers.

I. EMPLOYMENT AND LABOUR PRACTICES (CONTINUED)

In terms of compensation and welfare benefits, the Group guarantees the legal benefits of staff in accordance with *Tentative Provisions on Payment of Wages*, *Regulations on the Administration of Housing Fund*, *Regulation on the Annual Leave with Pay* and other laws and regulations. The Group also aims to meet the overall local requirements of social security policies, including endowment insurance, medical insurance, maternity insurance, unemployment insurance, critical illness insurance and other social insurance. In compliance with the *Labour Law*, the Group ensures that staff can enjoy all kinds of holidays including public holidays, paid annual leave, sick leave, marriage leave, maternity leave, etc. The Group also provides relevant benefits to staff during major festivals in China. The Group also provides free accommodation for teachers and staff of all units in the Group, and regularly conducts activities to enrich daily life of employees.

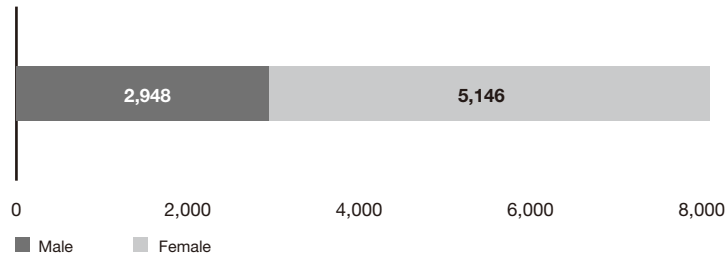
Upholding the promotion assessment mechanism of “valuing abilities regardless of educational background, valuing attitudes regardless of qualification and valuing performance regardless of certificates”, the Group has enacted a mature, fair and scientific promotion assessment mechanism. During the Reporting Period, the average age of middle management personnel of the Group was 38 years old. For a long time, the Group has been providing a fair career development platform for all staff and aims to ensure fair treatment in terms of employment, assessment, promotion, training, etc. Any discrimination related to religion, gender, age, and ethnicity is strictly forbidden in the Group. During the Reporting Period, the Group did not have any discrimination incidents.

By the end of the Reporting Period, the aggregate number of staff members in the Group was 8,094, with a proportion between men and women, which accounted for 36.4% and 63.6%, respectively, and the staff turnover rate was 9.4%. Due to the characteristics of the education industry, the Group has a higher proportion of female staff. In compliance with the law, the Group provides statutory benefits, including maternity leave, marriage leave and breast-feeding leave for female staff, to ensure that they are not discriminated against or otherwise disadvantaged.

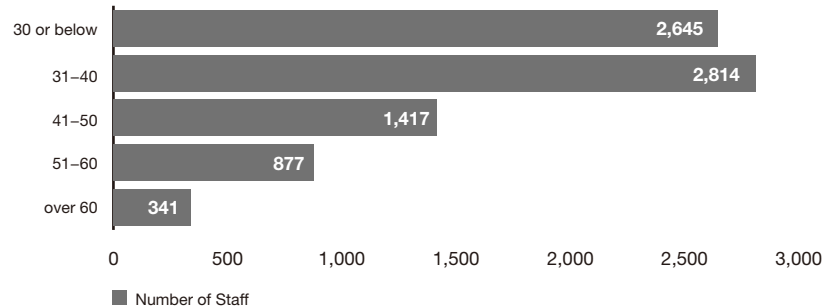
I. EMPLOYMENT AND LABOUR PRACTICES (CONTINUED)

EMPLOYMENT INDICATORS

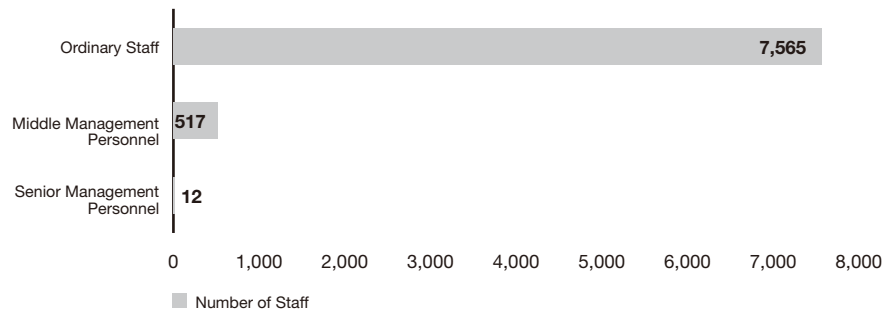
Staff by Gender in 2019



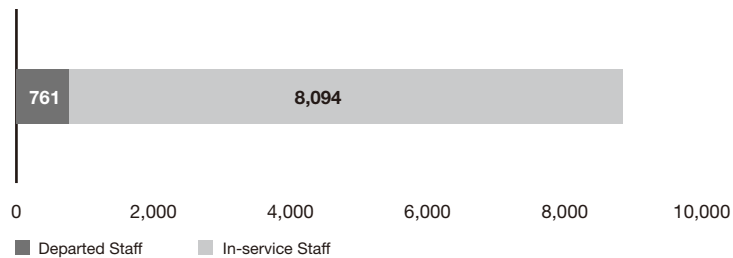
Staff by Age in 2019



Staff by Employment Type in 2019

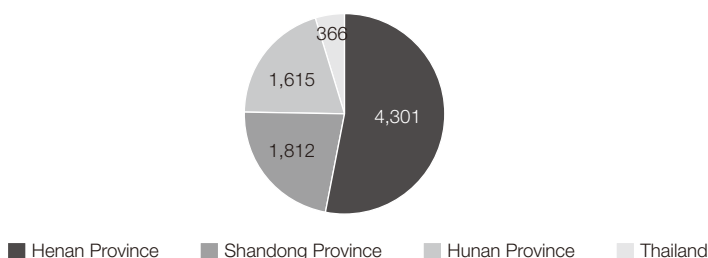


Staff by Departure Rate in 2019



I. EMPLOYMENT AND LABOUR PRACTICES (CONTINUED)

Staff by Geographical Region in 2019



HEALTH AND SAFETY

The Group strictly obeys the *Food Safety Law*, the *Management Regulation on Student Canteen and Student Group Meal Hygiene*, the *Regulations on the Administration of Sanitation in Public Places*, the *Law on Prevention and Treatment of Infectious Diseases*, the *Law on Fire Control* of the PRC and the *Food Act* and the *Public Health Act* of Thailand, as well as other relevant laws and regulations in the PRC and Thailand. The Group has not been punished by warnings, fines, and penalties for violations of laws or regulations during the Reporting Period. The Group has paid great attention to the health and safety issues of staff and students. Following the basic principle of “paying attention to prevention, self-rescue and mutual aid, ensuring safety and reducing losses”, the Group has formulated the *Staff Health and Safety Management System of Yuhua Education Group* to ensure the health and safety of staff and students of the Group. The Group has set up strict safety management rules and guidelines in terms of fire safety, health management, facilities and equipment management, anti-smoking and other aspects to practically provide a healthy and safe working and learning environment for teachers and students.

Fire Safety: The Group has incorporated fire safety into daily management, and has formulated a fire safety system in accordance with the requirements of the *Law on Fire Control*. The Group has set up small fire stations in each of the campuses which are specifically responsible for fire safety matters on the campuses. In addition, the Group holds fire drills and emergency escape drills every semester, which helps teachers and students to cope with sudden fire incidents while promoting fire safety awareness. The Group’s schools organise regular fire drills every year and invite local fire-fighters to go to schools to educate teachers, staff and students on fire safety knowledge and to provide guidance during fire drills. During the Reporting Period, a total of 50 fire drills were conducted at schools of the Group with the participation of a total of 89,926 people.

I. EMPLOYMENT AND LABOUR PRACTICES (CONTINUED)



Fire Drills Photos



Health Management in School Areas: In order to improve students' health standards, the Group has established and improved health management related policies and systems by clarifying responsible persons and establishing a regular working procedure. The Group's subordinate schools have set March and November as the months of the education and publicity of health, and have continuously improved the disease prevention and control system, infectious disease isolation system, physical examination system, and health file management system. In order to provide a healthy and safe campus environment, the Group has improved the health management level in school areas in all aspects by standardising the supervision and management of teaching hygiene, environmental sanitation management system, sanitary inspection system, and canteen sanitary supervision and management system.

In addition, the Group has also established a complete management system for the management of facilities and equipment such as air conditioners. Through a scientific and systematic management system, the Group effectively monitors and manages the operation of facilities and equipment, as well as maintaining and checking for potential safety hazards. At the same time, the Group has established a strict anti-smoking management system to ensure a safe and civilised office environment for employees, which is expected to protect the health of employees, and to maintain a good working, studying and living environment on the campus.

I. EMPLOYMENT AND LABOUR PRACTICES (CONTINUED)

In addition, the safety and health inspection projects which have been set up by the Group include: safety and health publicity and education; investigation and rectification of hidden safety hazards; management of dangerous chemicals; canteen food and boiler safety management; police and security work; medical health management; dormitory safety management; school bus safety management; and rectification of the campus and surrounding environment, among others. In response to various health and safety work arrangements, the General Affairs Department of the Group requires all units to keep relevant records and conduct regular inspections to ensure that staff and students can work in a safe environment.

During the Reporting Period, there were no work-related injuries or deaths in the Group.

DEVELOPMENT AND TRAINING

The teaching and management abilities of teachers and management staff are directly related to the teaching quality, management level and brand image of the Group's schools. Therefore, the Group has formulated detailed training programs to enhance the knowledge and professional competence of teachers and management personnel. With the aim of building and passing down experience, training activities mainly use a case analysis training model and can be divided into three categories: internal training; external training; and self-training by staff. During the Reporting Period, 100% of the Group's staff received such training. Senior and mid-level management personnel completed an average of 48 training hours while other staff members completed an average of 128 training hours.

During the Reporting Period, the major training activities organised by the Group included:

- From 20 March to 20 April 2019, a one-month graduate training event held at the Group's headquarters. Approximately 500 people were trained and had completed an average of 160 learning hours.
- On 10 April 2019, the teaching department of the Group organised the head teacher training and all middle management personnel and head teachers participated in this training. Approximately 600 people were trained and had completed an average of 28 learning hours.
- From 15 August to 20 August 2019, all subordinate schools of the Group organised the summer teacher training for all teachers. Approximately 2,954 people were trained and completed an average of 28 learning hours.
- During the Reporting Period, the Group had organised six training activities in association with personnel management system, education, moral education and other business activities. Approximately 160 middle management personnel were trained and completed an average of 128 learning hours.
- The "Blue Project" implemented by the Group carries out one-hour training activities for all young teachers every week, so that senior teachers can teach, help and guide young teachers. Approximately 800 young teachers were trained and had completed an average of 128 learning hours.

I. EMPLOYMENT AND LABOUR PRACTICES (CONTINUED)



Photos of Staff Training Activities

LABOUR STANDARDS

The Group strictly obeys the *Labour Law*, the *Protection of Minors Law*, the *Provisions on the Prohibition of Using Child Labour*, the *Teachers Law*, the *Code of Ethics of Teachers in Primary and Secondary Schools of the PRC* and the *Labour Protection Act*, the *Act on Establishment of Labour Courts and Labour Courts Procedures* of Thailand, as well as other relevant laws and regulations in the PRC and Thailand to recruit and hire staffs that protect the legitimate rights and interests of teachers and students. The Group prohibits any employment which would constitute child labour and forced labour, including compulsory labour and improper punitive measures. The Group clearly stipulates in the recruitment policy and processes that employment of child labour and forced labour are forbidden. The Group strictly implements the recruitment and hiring procedures in the *Staff Handbook*, and carefully checks the identity information of employees before hiring to ensure the truth and validity of personal information. During the Reporting Period, the Group did not have any form of compulsory labour or child labour incidents and related complaints. If any violations were to be detected, the Group would immediately cease any labour activities. Any false documents would be considered fraudulent and the Group would have the right to terminate the labour contract immediately.

II. OPERATING PRACTICES

SUPPLY CHAIN MANAGEMENT

During the Reporting Period, the Group's supply chain management system functioned smoothly. With a comprehensive management system in place, it ensured the procurement needs of subordinate schools were fulfilled and fully considered the environmental and social risks of suppliers. Major materials that the Group purchases are office supplies, wooden furniture, iron furniture, electronic equipment, teaching and tutoring materials, school uniforms and other goods. During the Reporting Period, the Group had 84 suppliers in total, with whom the Group has maintained multiple years of cooperation relationships. Out of the 84 suppliers, 4 were from Beijing, 2 from Shandong province, 1 from Liaoning province and the remaining 77 from Henan province.

The Group orders, purchases and distributes necessary materials for daily operations of schools according to the *Supplier Management Operation Manual*. In order to standardise material supply procedures, improve work efficiency, efficiently complete the supply of high quality materials, and strengthen monitoring and management of suppliers, the Group has formulated the *Measures on Management of Customers of Yuhua Education Group*. This is used for conducting scientific management of the Group's suppliers, including classification and screening of suppliers, management of information databases, assessment of suppliers and other aspects. The Group conducts assessment and rating of suppliers during the annual summer and winter vacations. If suppliers are found unsuitable, cooperation is terminated in a timely manner.

As an education service provider, the Group is dedicated to creating a safe, hygienic, comfortable and stable campus environment for teachers and students. In addition to considering the quality, brand names and qualifications of suppliers and their products, the Group also fully considers environmental and social risk factors of suppliers when screening suppliers. For example, we require suppliers to provide environmental impact assessment and quality inspection reports from Henan province when purchasing uniforms and other materials. We check the qualification certificate on raw material for products provided by suppliers when purchasing furniture, electrical appliances, teaching equipment, etc. In terms of supply chain management, the Group also takes measures favourable to creating environmental and social benefits. Firstly, the Group includes the purchase of materials and approval process in the enterprise resource planning (ERP) system. The Group also advocates for a paperless office. In addition, the Group adopts the semi-electronic operation in the process of bidding, and all kinds of documents are presented in electronic version to reduce the use of paper.

In compliance with the requirements of the Group's supplier management system, the procurement department can select suppliers based on historical procurement experience and local market conditions. Currently, there are 16 suppliers hired in accordance with the above practice, who mainly supply daily materials procurement. Since such kind of suppliers can meet the procurement needs of the Group's schools in the local area and emergent procurement demands, they are good supplements and good partners in the Group's supplier system. The Group can also hire suppliers based on the principle of "Priority on Efficiency and Quality" to satisfy the procurement needs with small contract value after sufficiently considering the price fluctuation, geographical location, personnel arrangement, car arrangement, delivery time and other factors. However, the procurement need with large contract value should be carried out in accordance with the *Supplier Management Operation Manual*.

II. OPERATING PRACTICES (CONTINUED)

The Group has established a comprehensive monitoring and supervising system for the hiring of suppliers and materials procurement. The asset management department, general affairs department and the departments who use materials can provide supervision opinions on the procurement price and the quality for the procurement department. The asset management department can check the price and quality of materials through the ERP system. Once detecting any unusual case, the procurement department should take action immediately and re-evaluate the suppliers promptly in accordance with the *Measures on Management of Customers of Yuhua Education Group*. If the supplier is responsible for the problem, the Group will never cooperate with it any more.

SERVICE RESPONSIBILITY

The Group and its subordinate schools carry out education work in strict accordance with the *Education Law*, the *Compulsory Education Law*, the *Higher Education Law*, the *Non-state Education Promotion Law*, *Several Provisions on the Administration of Non-state-operated Colleges and Universities*, the *Provisions on the Administration of Students in Regular Institutions of Higher Education* of the PRC and the *National Education Act* of Thailand, as well as applicable laws suitable for different school levels, and regulations of other relevant national laws of the PRC and Thailand. Each campus of the Group has introduced a series of policies and activities to ensure teaching quality:

- **University education:** The Group's universities, Zhengzhou Technology and Business University and Hunan International Economics University, have formulated scientific, systematic and well-established teaching management systems and related teaching quality supervision systems including class observation system, teaching supervision, teaching quality monitoring, course evaluation and information feedback to ensure the service quality of university education. Relevant policies and systems enacted by Zhengzhou Technology and Business University include the *Teaching Quality and Monitoring Bulletin*, the *Teaching Inspection System*, the *Class Observation by Administrative Personnel System*, the *Two-level Supervision Work Plan*, the *Identifying Methods for Teaching Quality Evaluation Level*, etc. Relevant policies and systems enacted by Hunan International Economics University include the *Daily Teaching Inspection System*, the *Class Observation System*, the *Regulations on Teaching Supervision*, the *Implementation Measures for Quality Control of Practical Teaching*, etc.
- **Primary and secondary school education:** Primary and secondary schools mainly adopt the collective lesson preparation model to ensure the quality of teaching. Primary and secondary schools organise teaching and research activities twice a week. Classrooms are not locked when the teacher gives lessons in order to facilitate the supervision of teaching by the academic affairs office, supervision office and other teachers as well as the observation and learning of other teachers at the same time. Relevant policies and regulations enacted by the Group's primary and secondary schools include the *Regulations on the Management of Teaching Practices*, the *Class Observation System*, the *System of Teaching and Research Activities*, the *Provisions for Teaching Assessment*, etc.
- **Kindergarten education:** The Group regularly conducts teaching and research activities including class appraisal, the teaching assistant's class evaluation, observation classes and other activities in order to enrich the teaching quality. In addition, the content learned by young children is assessed and evaluated every month and the results are included in the performance appraisal standards of teachers.

II. OPERATING PRACTICES (CONTINUED)

All subordinate schools of the Group have enacted the policy titled “*Identification and Treatment of Teaching Accident*”. For any teacher with deficiencies in teaching quality, schools will talk to and guide him/her to improve, while including in the relevant performance appraisal to avoid the recurrence of teaching accidents. To deal with complaints about education services, the Group has set up a special investigation team and made arrangements for the school leader to communicate with students and parents and listen carefully to the opinions of parents in order to find the shortcomings and improve supervision and inspection efforts. During the Reporting Period, the subordinate schools of the Group did not receive any complaints.

The Group has adopted reasonably effective marketing strategies to attract students and parents. Major marketing channels include Weibo, WeChat and other social media channels. During the Reporting Period, the marketing and promotion activities all abided by the *Advertising Law* and other laws and regulations.

The Group has introduced a series of policies to ensure the safe, stable and healthy development of students at campus. For instance, Zhengzhou Technology and Business University has formulated the *Regulations on the Management of Students Safety*, the *Regulations on the Management of Students Dormitories*, and the *Emergency Plans for Fire Safety and Management of Student Apartments*, etc. Hunan International Economics University has formulated the *Laboratory Safety Management Measures* and organises security checks regularly. In addition, the Group mainly adopts supervision and monitoring, returning visits to parents, students’ evaluation and safety education to supervise and management regular education services in primary and secondary schools. In the meantime, the Group has obtained timely feedback information and continuously improves the quality of teaching services. Regarding kindergarten education, the Group mainly adopts supervision and monitoring, returning visits to parents, safety education and sanitation safety to guarantee the health and safety for kids during the teaching process.

In terms of knowledge copyright protection, the teaching materials used by the subordinate schools of the Group are all ordered from authorised publishers, and the Group purchases the teaching resources website accounts for teachers to ensure that schools at all levels use the educational resources with copyright. The Group has also formulated the *Measures for Morality and Talents Enhancement Teaching Material Management*, the *Measures for Intellectual Property Management of Zhengzhou Technology and Business University* and *Measures for Patent Management of Zhengzhou Technology and Business University* to ensure that the relevant intellectual property rights are protected properly.

The Group has formulated the *Student File Management Work*, the *Measures for Archive Management*, the *Measures for Student File Management of Zhengzhou Technology and Business University* and other policies to protect the security of personal information. The Group has also signed non-disclosure agreements with staff that may be involved in the student information safety and private information generally. The Group also carries out relevant training to instruct teachers and staff to strictly abide by the obligation to maintain confidentiality and respect the privacy of students.

II. OPERATING PRACTICES (CONTINUED)

ANTI-CORRUPTION

The Group strictly obeys the *Criminal Law*, the *Company Law*, the *Interim Provisions on the Prohibition of Commercial Bribery*, the *Anti-Money Laundering Law*, the *General Principles of Civil Law*, the *Anti-Unfair Competition Law*, the *Contract Law* of the PRC and the *New Anti-Corruption Law* and the *Criminal Code* of Thailand as well as other laws and regulations of the PRC and Thailand to prevent bribery, extortion, fraud and money laundering and other corrupted incidents.

In order to regulate the professional behaviour of staff, the Group strictly obeys the relevant laws, industry norms and standards of professional ethics, and rules and regulations of the Group. The Group has also formulated the *Measures for Anti-embezzlement and Reporting Management Mechanism* to prevent bribery, extortion, fraud, money laundering and other types of embezzlement. In addition, the Group requires any staff involved in economic activities to sign and abide by the *Letter of Commitment of Honesty and Self-discipline*. Staff members are held accountable if any violations are detected. Further, all suppliers, service providers and contractors which have business relations with the Group must also sign the *Anti-Commercial Bribery Agreement* before establishing the cooperative relations. The human resources department, legal department and internal control department of the Group also conduct training to strengthen the knowledge of staff members in relation to bribery, extortion, fraud, money laundering and other illegal activities in order to establish the correct values and strengthen the ability of staff to identify and distinguish legal and illegal, honest and dishonest, and moral act and immoral acts.

During the Reporting Period, there were no significant changes to the illegal acts and related enforcement and monitoring measures formulated by the Group. Major measures are as follows:

- setting up the reporting telephone and mailbox as the channel to report actual or suspected embezzlement cases for which the internal control department is responsible for accepting, retaining and handling reports;
- the internal control department may also carry out random checks on work procedures and results of departments engaged in economic activities;
- the finance department regularly examines economic activities and delivers suspected cases of embezzlement to the internal control department for investigation;
- the asset department checks the work of departments with the ability to purchase through market research and delivers suspected cases of embezzlement to the internal control department for investigation; and
- for any staff who engages in embezzlement whether or not amounting to a criminal offence, the internal control department will recommend company management to impose corresponding internal economic and administrative disciplinary punishments according to the regulations, and, should the staff member possibly be in violation of the law, the internal control department will transfer the case to the relevant authorities.

During the Reporting Period, the Group did not have any bribery, extortion, fraud, money laundering or other embezzlement cases.

III. COMMUNITY INVESTMENT

The Group actively fulfils its corporate social responsibility by participating in the cause of public welfare and community development. The Group gives full play to its own strengths including by actively participating in all kinds of community activities and organising teachers and students to learn through community education, humanistic care, culture and art, urban construction and other activities. Further, the Group fully reflects staff care in providing jobs and a good working environment, including providing diversified training and promotion opportunities. In addition, the Group's schools attach great importance to the ideological and moral education of students and strive to cultivate good moral character and a strong sense of social responsibility. Schools regularly communicate with parents on education methods to create a harmonious family environment.

During the Reporting Period, the Group's subordinate schools actively took social responsibility through various channels and means. The Group has carried out poverty alleviation activities in poor rural areas, and participated in social welfare activities by providing funds, materials and manpower. Student from subordinate universities actively participated in aid education and continuously raised their awareness of social responsibility. Subordinate primary and secondary schools not only actively participated in the construction of civilised cities and volunteering activities, but also organised lectures and practical activities related to social responsibility to promote social responsibility awareness. Also, a variety of community practical activities have been carried out at subordinate kindergartens to cultivate and develop the sense of social responsibility for young children through personal experience.

PUBLIC WELFARE VOLUNTEER ACTIVITIES

In the Reporting Period, the Group's schools have made full use of their advantages and have carried out many public welfare activities. During the Reporting Period, the major social public welfare activities held by each school of the Group are:

Schools	Major social public welfare activities
The Group	<ul style="list-style-type: none">➤ Participated in the poverty alleviation activities in Ansheng Village of Anyang, Fangwa Village of Xinyang.➤ Participated in the poverty alleviation activities through precise education in the Primary School of Nanguanzhuang of Wuzhi County, Jiaozuo City.
Zhengzhou Technology and Business University	<ul style="list-style-type: none">➤ Organised and participated in the voluntary aid education in the Hegang Primary School, Hegang Village, Zhangqiao Town, Fuling County.
Hunan International Economics University	<ul style="list-style-type: none">➤ In the financial year of 2019, the school launched a number of public welfare activities such as visiting the nursing home, helping the disabled through the Sunshine Campus, voluntary blood donation, aid education in summer break, etc. Nearly 5,000 students have participated in the above activities.

III. COMMUNITY INVESTMENT (CONTINUED)

Schools	Major social public welfare activities
Kaifeng Yuhua Elite School	<ul style="list-style-type: none"> ➤ In September 2018, the school participated in the volunteer activities of reading meetings of Liuxiaolingtong. ➤ In November 2018, the school launched an environment protection activity. Volunteers picked up the trash on campus and surrounding areas. ➤ In December 2018, the school participated in the volunteer activities in Kaifeng Library. During the same month, the primary school sector launched the volunteer activity of learning Leifeng. ➤ In February 2019, the school participated in the public welfare activity of "New Green Fashion, Yuhua Charity Walk". ➤ In March 2019, the school participated in the volunteer activity at the Day of Leifeng. ➤ In April 2019, the school participated in the environment protection action in Bianxi Lake. ➤ In May 2019, the school participated in the volunteer activity at the Youth Day. ➤ In June 2019, the school participated in the volunteer activity organised by School Youth League Committee. ➤ In August 2019, the primary school sector organised the activity of clean hometown and beautify the environment. Volunteers helped the sanitation workers at the fifth street and cleaned road railing.
Jiaozuo Yuhua Elite School	<ul style="list-style-type: none"> ➤ In October 2018, the school organised students to conduct compulsory aid education in child welfare centre. ➤ In November 2018, the school organised condolences activity in the Second Charity Hospital of Jiaozuo. During the same month, the school organised the donation activity of "Thanksgiving and Walk with Love". ➤ From January 2019 to August 2019, the school organised "Zhi Zhi Shuang Fu" activity, providing aid education service to areas with scarce education resources. ➤ In March 2019, Leifeng Association of Jiaozuo City held a large-scale public welfare activity of leaning Leifeng. ➤ In April 2019, volunteers of young teachers conducted condolence activity to Jiaozuo Army Division and delivered the common sense of sports emergency.

III. COMMUNITY INVESTMENT (CONTINUED)

Schools	Major social public welfare activities
Jiyuan Yuhua Elite School	<ul style="list-style-type: none"> ➤ In the financial year of 2019, the school organised the activity of Condolences to the Cutest Person Around. Volunteers took condolences for sanitation workers and traffic police. The school also participated in the Meteorological Festival of Jiyuan, Opening Ceremony of World Environment Day, Chinese New Year Party for Children, etc.
Luohe Yuhua Elite School	<ul style="list-style-type: none"> ➤ In October 2018, the school organised students to donate books to children from poor areas. ➤ On Tomb-Sweeping Day in 2019, the school sent student representatives to Luohe Revolutionary Martyrs Cemetery to carry out the education activity of “Worshiping the Heroes in Qingming, Casting Chinese Souls Together”, cherishing the heroes and inherited red spirit. ➤ On Labour Day in 2019, the school organised students to walk on streets to take condolences to hard-working people.
Kindergarten Headquarter	<ul style="list-style-type: none"> ➤ In April 2019, the school conducted the donation activity of “Hand by Hand” with Zhaoji Primary School, Xitao Village, Zhongmou County. ➤ In May 2019, the school visited the military museum of Henan Military Region and take condolences to the soldiers. ➤ In June 2019, the school held a propaganda event of “Small Long March” by singing red songs and showing love to the country.
Kindergarten in Luohe	<ul style="list-style-type: none"> ➤ The school organised the environmental protection initiative called “Little Citizens, Big Voices” in Red Maple Plaza to promote the environment protection concept through garbage collection and environmental protection proposals.
Kindergarten in Xingyang	<ul style="list-style-type: none"> ➤ In March 2019, the school organised students to pick up garbage in Tianjian Lake in Xingyang, aiming to strengthen the environment protection awareness of students. ➤ In June 2019, the school held the activity of “Low-carbon environment protection, love and charity sales, and make the best use of objects”.

III. COMMUNITY INVESTMENT (CONTINUED)



Public Welfare Volunteer Activities



SOCIAL DONATION

The Group mainly focuses on social donations and sponsorship projects for local education, cultural construction, poverty alleviation, assisting women and children, and environmental welfare activities. Major projects include but are not limited to:

- The Group sponsored the Zhengzhou study and exchange activities of teachers and students in Zhongyu Village Primary School of Luoyang City;
- The Group donated over RMB130 thousand to the local environment protection project “Otis Tarda Return Home” in Henan;
- The Group donated over RMB22 thousand to the activity of “Aid with Love Activity of the Youth League”;
- Kaifeng Yuhua High School donated over RMB70 thousand and office supplies to the poverty alleviation by education; and
- Kaifeng Yuhua Elite School donated over 100 books to the Hand with Hand Primary School in Lankao County.

III. COMMUNITY INVESTMENT (CONTINUED)

STAFF CARE

As teaching staff are a significant asset of education providers, the Group has always shown great care for our staff. After fully understanding the actual needs of our staff, we offer various support in the form of money, materials, manpower, greetings and so on to help our staff overcome difficulties they face with in daily life, in mental life and in their jobs.

The Group's subordinate school, Hunan International Economics University, has carried out sending warmth and assistant work for staff. The university has formed a fine tradition that the school must visit staff under four scenarios, when someone is in hospital, losing loved ones, facing natural calamities and man-made misfortunes. Meanwhile, the school continuously raised the level of consolation fund, which was up to RMB500 thousand and RMB242 thousand was distributed to staff have extremely poor problems. At the same time, the school union established a supporting mechanism for the extremely poor teachers and staff, and established personal files for all staff with problems. During the Reporting Period, the school applied for the provincial education foundation "Love Candle" relief fund of RMB20,000 for two seriously ill teaching staff. The school also applied the special poor assistance from the provincial education trade union for nearly 20 employees in difficulty.

In addition, primary and secondary schools and kindergartens in various districts have provided assistance to assist staffs encountering difficulties in daily life and mental life with the actual needs of staff, including funds, materials, human assistance and spiritual condolences. The Group also gives benefits to staff during holidays such as the Women's Day, the Dragon Boat Festival, the Mid-Autumn Festival, Teacher's Day, Spring Festival, as well as showing concerns to staff's daily lives.

Over the past fiscal year, subordinate schools of the Group have devoted themselves in community building and taken a good lead in their communities. During the Reporting Period, subordinate schools of the Group have won over 30 awards.

IV. ENVIRONMENTAL

Strictly complying with applicable laws and regulations including the *Environmental Protection Law*, the *Atmospheric Pollution Prevention Law*, the *Water Pollution Prevention Law*, the *Solid Waste Pollution Control Law*, and the *Energy Conservation Law* in China, the Group ensures that the daily operations of subordinate schools do not have a significant impact on the environment and natural resources. The Group has formulated the *Detailed Regulations for Energy Conservation Management* to effectively promote energy conservation and emission reduction in accordance with the spirit of the *Energy Conservation Management Measures of Henan Province*. The regulation aims to minimise the consumption of water, electricity and natural gas, and the emission of waste water and gas as much as possible by management energy-saving, technical energy-saving and behavioural energy-saving, realizing the effective and rational use of energy and promoting the construction of energy-saving campus. During the Reporting Period, the Group did not violate relevant laws and regulations, and has not received any complaints regarding the emission of waste gases, greenhouse gases and pollutants.

EMISSIONS

The Group is principally engaged in education services. No substantial emissions are produced by combustion of any fuels in daily operation as the Group is not engaged in any industrial production. During the Reporting Period, the principal type of emission of the Group is exhaust generated by the Group's self-owned vehicles. The main emission data are as follows:

Major emissions	Unit	Emission volume
Nitrogen oxide (NO _x)	Gram	673,012.0
Sulphur dioxide (SO _x)	Gram	637.2
Particulate Matter	Gram	66,032.1

The Group does not generate any greenhouse gases through any fixed combustion source. The direct emission of greenhouse gases is the exhaust produced by the Group's self-owned vehicles. Indirect greenhouse gas emission was mainly generated from the use of electricity, natural gas, etc. During the Reporting Period, the Group's emission type and data of major greenhouse gases are as below:

Greenhouse gases	Unit	Emission volume
Carbon dioxide	Ton	49,100.4
Methane	Ton	0.2
Nitrous oxide	Ton	14.8

IV. ENVIRONMENTAL (CONTINUED)

No hazardous waste is produced during daily operation of the Group. The non-hazardous wastes generated by the Group mainly include garbage generated in the daily operation of schools such as office supplies and food residues. After waste by the Group, waste is transferred by the municipal disposal company (which satisfies legal and regulatory requirements) to the garbage transfer station designated by environmental, health and other departments in line with relevant national and regional treatment standards. Further, garbage collection areas of schools of the Group are disinfected at least twice daily to ensure that it waste not substantially affect the school environment. In addition, the wastewater pipelines of the Group's campuses are handed over to professional dredging companies for cleaning up to once a week. After initial sedimentation, the domestic wastewater generated during the daily operation will be pumped into municipal wastewater pipeline and delivered to professional wastewater treatment companies for further handling.

During the Reporting Period, the Group did not have specific statistical data on non-hazardous wastes. The Group has always been focused on the classification, disposal and reuse of waste. While implementing education and guidance work, the Group advocates the concept of "turning waste into wealth and treasure". Based on the *Regulations on the Management of Waste Disposal* by Yuhua Education Group, the Group has established relevant waste recycling systems to further promote the construction of the conservation and environmental-friendly school community.

The Group mainly reduces the emission of waste gases and greenhouse gases based on the formulated policy of the *Detailed Regulations for Energy Conservation Management*. For instance, promoting new type energy-saving and environmentally friendly products, encouraging the use of water-saving and electricity-saving facilities and appliances, strictly controlling the procurement of large-size equipment consuming large amount of energy, preferentially purchasing products that meet national energy-saving standards with energy efficiency labels. In the meantime, the Group continuously strengthens the recycling and discharge of the waste objects to prevent pollution damage to the environment from the origin. During the Reporting Period, the emissions of the Group's major emission types have significantly declined compared with the previous fiscal year. Specifically, nitrogen oxide declined by 17.6%, sulphur dioxide declined by 13.6% and particulate matter declined by 17.7%. The Group's subordinate schools have also achieved a reduction of approximately 500 tons in carbon dioxide by planting various types of trees.

USE OF RESOURCES

Promoting the good fashion of "saving being a glory, waste being a shame", the Group regularly conducts the emission reduction training according to the *Training Program of Energy Conservation and Emission Reduction*, at the beginning of each year, and actively carries out energy-saving and energy reduction actions by focusing on energy-saving, water-saving, electricity-saving and material-saving engineer and build energy-saving schools.

IV. ENVIRONMENTAL (CONTINUED)

The Group has made rational use of energy and resources such as water, electricity and natural gas. At the same time, we help students develop good habits for use of energy resources in order to limit waste. During the Reporting Period, the main energy and resources consumption of the Group was as follows:

Type of energy	Unit	Consumption
Total amount of electricity consumed	Megawatt-hour	54,257.8
Intensity	Megawatt-hour/ school	1,871.0
Total amount of water consumed	Thousand ton	3,153.7
Intensity	Thousand ton /school	108.7
Total natural gas consumption	Thousand m ³	925.0
Intensity	Thousand m ³ /school	31.9
Total gasoline consumption	Litre	43,347.2
Intensity	Litre/school	1,494.7

The Group's energy use efficiency plan is mainly carried out in accordance with the *Detailed Regulations for Energy Conservation Management* formulated by the Group, and enhances the staff's awareness of energy conservation and emission reduction by regularly training them in conjunction with the *Training Program of Energy Conservation and Emission Reduction* at the beginning of each year. The Group improves the utilisation of energy and resources by clarifying the responsibilities of various departments within the school, and through measures such as scientific management, technology upgrades, and behavioural training. For instance, we vigorously promote the application of energy-efficient teaching equipment; we promote the construction of paperless office and decrease the use of paper; we reform the water supply pipeline at campus and raise the repeated use rate of water; we reconstruct the lighting facilities at campus and vigorously promote the energy-saving lamps, as well as launching green lighting projects. The Group continuously strengthens the management of the use of water, electricity and natural gas, and cultivates students' awareness of saving energy and water.

The Group has not encountered problems in sourcing water that is fit for purpose. All of the Group's schools have stable sources of water. In accordance with the *Detailed Regulations for Energy Conservation Management*, the Group has formulated a strict water utilisation system through management, supervision and charging method to save water. Further, the Group has implemented reconstruction projects in the water supply pipeline at campus to raise the repeated use rate of water.

During the Reporting Period, the Group has achieved significant results in improving the efficiency of using energy and resources. The total natural gas consumption has declined by 43.3%, and the total gasoline consumption has declined by 13.6%.

As the Group does not manufacture any products, the Group does not use any kind of packaging materials.

IV. ENVIRONMENTAL (CONTINUED)

ENVIRONMENT AND NATURAL RESOURCES

The Group's schools do not have any major impact on the environment and natural resources during daily operation. The Group advocates "low-carbon traveling" to minimise the emission of pollutants and greenhouse gases from vehicles. In the meantime, according to the formulated *Detailed Regulations for Energy Conservation Management*, the Group constantly monitors the emission of pollutants and the energy consumption of water, electricity and natural gas. The Group has formed an energy management system centred with management energy saving, technical energy saving, and behavioural energy saving to ensure that the company's business activities have created the lowest impact on the surrounding community environment and natural resources. To reduce the potential threat to natural resources caused by possibly abusive use of paper, the Group formulated the *Provisions on the Use of Paper* to reasonably regulate the use of office and teaching materials as well as promoting a paperless office environment to minimise paper consumption at best efforts, and ensuring the effective use of paper and eliminating paper waste. In addition, the Group strongly promotes afforestation activities in order to protect the environment. During the Reporting Period, the Group planted more than 200,000 trees and greened over 20 thousand square meters of lawn.



中国宇华教育集团有限公司
China YuHua Education Corporation Limited