



中國稀土控股有限公司
China Rare Earth Holdings Limited

(Incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立之有限公司)

Stock code 股份代號 : 00769

*Environmental, Social
and Governance Report*

2019

環境、社會及管治報告



環境、社會及管治報告 2019

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1. 範圍

中國稀土控股有限公司(「本公司」)及其附屬公司(統稱「本集團」)為中國最大規模的稀土及耐火材料生產商之一。本集團於一九九九年十月十五日在香港聯合交易所有限公司上市，是中國首間在海外上市的私有稀土和耐火材料生產企業。本集團的總辦事處及主要營業地點位於中國江蘇省宜興市丁蜀鎮，而本集團的香港營業地點則位於香港灣仔告士打道39號夏慤大廈2509室。

本集團持續發展業務，維護持份者利益，致力實現長遠共贏，與之同時，亦關注環境、社會及管治的事宜，並於本報告內闡述。本報告的內容乃按照香港聯合交易所有限公司上市規則附錄二十七所載之環境、社會及管治報告指引而編製，報告期為二零一九年一月一日至二零一九年十二月三十一日，內容主要包含了本集團旗下四間附屬公司在報告期內於環境及社會責任方面的方向及實踐：

- 宜興新威利成稀土有限公司，主要從事製造及銷售稀土產品；
- 宜興新威利成耐火材料有限公司，主要從事製造及銷售耐火產品；
- 無錫新威高溫陶瓷有限公司，主要從事製造及銷售高溫陶瓷產品；及
- 海城市蘇海鎂礦有限公司，主要從事製造及銷售鎂砂產品。

1. SCOPE

China Rare Earth Holdings Limited (the “Company”) and its subsidiaries (collectively the “Group”) is one of the largest producers of rare earth and refractory materials in China. The Group was listed on The Stock Exchange of Hong Kong Limited on 15 October 1999 and is the first private rare earth and refractory materials producer in China that is listed overseas. The Group’s main office and its main business location is at Dingshu Town, Yixing City, Jiangsu Province, PRC and the Group’s Hong Kong business location is at Room 2509, Harcourt House, 39 Gloucester Road, Wanchai, Hong Kong.

In addition to the sustainable development of business, protection of stakeholder’s rights and commitment to achieving a win-win situation, the Group has focused on environmental, social and governance issues, which were elaborated in this report. The content of this report is prepared in compliance with the Environmental, Social and Governance Reporting Guide set out in the Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. The reporting period is from 1 January 2019 to 31 December 2019, and has mainly consisted of directions and practices of the Group’s four subsidiaries in respect of environmental and social responsibilities during the reporting period:

- Yixing Xinwei Leeshing Rare Earth Company Limited, mainly engaged in manufacturing and sales of rare earth products;
- Yixing Xinwei Leeshing Refractory Materials Company Limited, mainly engaged in manufacturing and sales of refractory products;
- Wuxi Xinwei High Temperature Ceramics Co., Ltd., mainly engaged in manufacturing and sales of high temperature ceramics products; and
- Haicheng City Suhai Magnesium Ore Co., Ltd., mainly engaged in manufacturing and sales of magnesium products.

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以上四間附屬公司已涵蓋本集團的主要業務，以確立此報告的代表性。

2. 與持份者溝通

本集團與各持份者，包括客戶、供應商、員工及投資者等緊密溝通，瞭解持份者對本集團履行企業社會責任的期望，以規劃社會責任的發展策略，從而達至持續發展業務的目標。本集團的高級管理人員不時與各持份者進行探訪會議及電話會議，又通過電郵、公司郵箱及顧客服務熱線讓各持份者瞭解本集團之最新發展狀況；客戶服務專員亦持續與各持份者接觸，聆聽他們的意見及需求。

本集團在每年的中期報告及年報中向各股東匯報整體業績表現，又在環境、社會及管治報告中匯報社會責任表現，亦通過舉行股東大會，為股東及董事會提供溝通機會。董事會主席以及審核委員會、薪酬委員會及提名委員會之主席或其委任之代表，在股東週年大會上回答股東的提問。為更進一步促進與各持份者的有效溝通，本公司設有官方網站www.creh.com.hk，用於廣泛刊載本集團業務發展及營運最新訊息、財務訊息及其他訊息。

The above four subsidiaries covered the main business of the Group and established the representativeness of this report.

2. COMMUNICATION WITH STAKEHOLDERS

The Group has maintained close communication with stakeholders including customers, suppliers, employees and investors to understand stakeholders' expectations for the Group's performance in corporate social responsibility. It facilitates in formulation of the Group's social responsibility development strategy in order to achieve the goal of sustainable business development. The Group's senior management members conduct interviews and conference calls with stakeholders from time to time. The Group's updates are communicated to stakeholders through e-mail, corporate mail and customer service hotline. The customer service specialist is also in constant contact with stakeholders to listen to their views and needs.

The overall performance of the Group is reported to the shareholders in the interim report and annual report on a yearly basis. The social responsibility performance is reported in the Environmental, Social and Governance Report. The Company also provides opportunities for shareholders and the Board of Directors to communicate through general meetings. The Chairman of the Board of Directors and the Chairmen of the Audit Committee, the Remuneration Committee and the Nomination Committee or their designated representatives answer shareholders' questions at annual general meetings. To further facilitate effective communication with the stakeholders, the Company has an official website at www.creh.com.hk for the extensive publication of the Group's business development and operation news, financial information and other information.

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3. 環境、社會及管治表現

3.1 環境

3.1.1 排放物

政府圍繞資源環境保護、打擊非法生產，行業格局將繼續得到改善。本集團深明遏制全球氣溫上升已經刻不容緩，緩減氣候變化已是全球的重要議題。為緩減本集團在日常運作中所產生的廢氣、溫室氣體、廢水、固體廢棄物及其他污染物會對環境造成破壞，本集團制定相應的環保政策，並採取一系列不同層級的應對措施。

1. 應用清潔能源

本集團配合國家政策方向，推進電力和天然氣等優質能源的使用，以燃氣鍋爐取代傳統燃煤鍋爐，從而減少運作時產出的空氣污染物。

2. 以資訊科技互聯互通

本集團主張應用資訊科技如電話會議、視像會議或採用電子郵件取代不必要的出行活動，加強商務出行的節約管理。在需要出行情況下盡量使用公共交通工具，從而減少因交通運輸所產生的廢氣及溫室氣體排放。

3. ENVIRONMENTAL, SOCIAL AND GOVERNANCE PERFORMANCE

3.1 Environmental

3.1.1 Emissions

With government efforts to protect the environment, eliminate illegal production, and upgrade the industry, the industrial structure will continue to be improved. Dealing with climate change and stemming global warming is an important issue for the entire world. To mitigate the impact of greenhouse gases, sewage, solid wastes and other pollutants generated in its daily operation to the environment, the Group has formulated a series of environmental policies, and taken an array of measures.

1. Use of Clean Energy

The Group followed the directions of the country policies and promoted the use of superior energy sources such as using electric power and natural gas, and replacing traditional coal-fired boilers with gas-fired boilers, thereby reducing the gaseous pollutant generated during operation.

2. Communication with Information Technology

The Group encouraged employees to use telecommunication technologies such as telephone conferences, video conferences and e-mail communications to avoid unnecessary trips, and strengthened the management of business trips. If a business trip is necessary, public transportation should be used as much as possible to reduce the waste gas and greenhouse gas emissions generated by transportation.

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3. 室內空氣質素管理

本集團的廠區內亦禁止存放可能逸散粉塵、惡臭氣體的物質，並禁止燃燒物品，又盡可能開窗通風或使用壁扇加強車間內的換氣流量，同時亦裝設吸附塔吸收生產車間內的異味氣體。為保持室內空氣質量良好，辦公室室內及生產車間已實施全面禁煙，僅劃分部份室外特定範圍作為吸煙區。

4. 重用再造

本集團鼓勵循環再用日常生產所需的資源，例如盡量選擇使用可再次充裝的辦公用品等，而本集團會分類收集及存放自身無法直接循環再用的物資，如包裝塑膠袋、工業保鮮膜、原料內包裝袋等，再交由具有相關資質的單位合規處理。

5. 中水及雨水回用

本集團不斷探索改善生產用水給水方式，添置環保設備回收處理可再次利用的廢水及收集雨水，並通過在生產過程中實行串聯用水、梯級用水，以減少生產過程中廢水的產生量。

於報告期內，本集團恪守包括中華人民共和國大氣污染防治法、中華人民共和國固體廢物污染環境防治法等相關環保法例，沒有任何違反環境法律法規的個案發生。於報告期內，有關附屬公司所產生的廢氣及廢棄物排放量分列如下：

3. Indoor Air Quality Management

Substances that may emit dust and malodorous gas are not allowed to be stored in plants. Incineration is prohibited as well. Ventilation is achieved by keeping windows open, or using wall fans to facilitate the airflow in workshops. At the same time adsorption tower is utilised to absorb odor in workshops. In order to maintain indoor air quality, the Group has implemented a non-smoking policy in office area and production workshops, and some outdoor areas are specified as smoking areas.

4. Reuse and Recycle

The Group encouraged the reuse of resources needed in daily production, for example, office supplies with refills are selected whenever possible. The Group segregated and stored resources that cannot be directly reused, such as packaging plastic bags, industrial plastic wraps and raw material packaging bags, and transferred to qualified agencies for proper disposal.

5. Reuse of Reclaimed Water and Rain Water

Methods are being explored by the Group to optimise the water use and supply in production process. Environmental friendly equipment has been added to recycle reusable sewage and rainwater. Series water use and progressive water use methods are adopted to reduce the generation of sewage from the production process.

During the reporting period, the Group has adhered to the Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution, Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes and other relevant laws. There were no cases of violation of environmental protection laws and regulations. The amount of exhaust gases and waste generated by the relevant subsidiaries during the reporting period are detailed below:

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	單位 Unit	數量 Amount	
		二零一九年 2019	二零一八年 2018
廢氣種類			
Type of Exhaust Gas			
氧化氮 (NOx) (由氣體燃料消耗而產生)	公斤	358.83	493.78
Nitric Oxide (NOx) (Produced by gaseous fuel consumption)	Kilogram		
氧化硫 (SOx) (由氣體燃料消耗而產生)	公斤	1.79	2.46
Sulfur Oxide (SOx) (Produced by gaseous fuel consumption)	Kilogram		
氧化氮 (NOx) (由汽車使用而產生)	公斤	190.00	227.29
Nitric Oxide (NOx) (Produced by vehicular use)	Kilogram		
氧化硫 (SOx) (由汽車使用而產生)	公斤	0.58	1.79
Sulfur Oxide (SOx) (Produced by vehicular use)	Kilogram		
顆粒物 (PM) (由汽車使用而產生)	公斤	12.75	19.66
Particulate Matter (PM) (Produced by vehicular use)	Kilogram		
溫室氣體 (包括範圍1及範圍2)	公噸二氧化碳當量	58,060.84	79,242.27
Greenhouse Gas (Includes Scope 1 and Scope 2)	Tonne of Carbon Dioxide Equivalent		
廢棄物種類			
Type of Waste			
有害廢棄物	公噸	5.67	182.11
Hazardous Waste	Tonne		
無害廢棄物	公噸	50.96	55.60
Non-hazardous Waste	Tonne		

廢氣減少有賴於整體用氣及汽車行走里數有所減少。而溫室氣體較去年有一定幅度的減少，得益於本集團進一步加強天然氣、電耗和用水內控，集中時間段進行生產，優化了生產流程結構，有效降低消耗。有害廢棄物減少亦由於產量有所減少，另外由於部份附屬公司採用新技術，大幅減少使用活性炭，所以有害物質也隨之減少。

The reduction of exhaust gas was because of the reduction of overall gas consumption and the mileage of cars. Greenhouse gases decreased to a certain extent compared with last year. Thanks to the Group's further strengthening of internal control over natural gas, electricity consumption and water use, concentrating production time and optimising production processes, these effectively reduced consumption. The reduction of hazardous waste is also due to the decrease in production. In addition, because some subsidiaries adopted new technologies and greatly reduced the use of activated carbon, harmful substances also decreased.

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3.1.2 資源使用

本集團深諳地球上的資源有限，透過節約用電、用水、用紙奉行其節約資源使用的重要理念。本集團優先採用更具能源效益的器具，同時有效地收集下游的廢水，經過沉澱及過濾後推行中水回收再用，大幅減少水源消耗。有效的能源及其他資源運用令成本下降，有助本集團成為客戶的可持續發展夥伴。

1. 綠色生產

本集團不斷探索不同措施提升資源使用效率，制定設備使用指引，從多方面推行節約資源措施。同時強調定期保養、及時維修和正確操作生產設備以求發揮生產設備的最佳運行效率。質檢單位在生產過程中每個環節均進行質量檢測，以最大力度減少廢品率。與此同時，本集團鼓勵無紙化辦公，審閱文件盡量以電子文檔為主，從而減少紙張、墨水匣、碳粉匣等資源的浪費，並分類收集、存放廢棄物，以便重用及轉交合資格處理商回收。

3.1.2 Use of Resources

The Group understands that resources on the planet are limited, and is devoted to principles including conservation of power, water and paper during operating activities. Priority is given to appliances that are more energy efficient. Meanwhile, the Group collects downstream wastewater efficiently. Water is reused after precipitation and filtration, which greatly reduced the consumption of raw water. The efficient use of energy and other resources reduces costs, and helps the Group to become a sustainable partner for customers.

1. Green Production

The Group continuously explores measures of enhancing efficiency in use of resources and formulates user guides for equipment. The Group has implemented many resources saving measures. In addition, the Group emphasises on proper use of production equipment, timely repairs, constant maintenance and operations of equipment, thereby making equipment operating at the top efficiency. Quality inspection is conducted at each step in the production process to reduce scraps. Meanwhile, employees are required to save office supplies. Electronic files are preferred when reviewing documents in order to reduce the waste of paper and ink resources. Wastes are segregated and stored by category to facilitate reusing and recycling by qualified agencies.

2. 提升能源效益

本集團積極提升能源效益，專注節能減排升級，例如為空調於夏季時及其他用電設備於閒置時的啟動及關停提供清晰的使用指引、在車間遙控室的空調系統裝設了時間區域設置、於更換照明系統時採用能源效益表現較佳的LED燈具、逐步淘汰更換被國家列為高能耗的設備與電機。

3. 善用水資源

儘管本集團的生產流程用水量相對較少，惟善用水資源仍不應被忽視。本集團尋求改進生產用水給水方式，通過添置環保設備，處理生產廢水至達標後再循環使用。本集團又指派專人進行定期檢查管道及水龍頭等設施，務求對設備滴水、漏水等問題能及時維修處理。本集團通過在用水現場張貼節水提示，倡導員工及訪客節約用水，做到不開無人水，杜絕跑冒滴漏現象。

2. Improve Energy Efficiency

The Group has made efforts in boosting energy efficiency, and focused on energy conservation and emission reduction, which included providing clear guides for the switching-on and switching-off of air conditioners in summer and other equipment that are not in use, setting up time zone setting for air conditioning system in workshops' control rooms, replacing the lighting system with LED lights that are more energy efficient, and gradually replacing and retiring equipment and motors that are classified as high energy-consumption equipment under relevant country rules.

3. Water Conservation

Although the Group does not use a lot of water during production, it attaches importance to efficient use of water resource. The Group explored methods to optimise the water use and supply in the production process, and added environmental friendly equipment to treat sewage for reuse once it meets relevant standards. The Group appoints designated staffs who are responsible for checking water facilities, such as pipes and faucets, on a regular basis posts in order to repair water leaks promptly. Water-saving signs are also posted near water sources to encourage employees and visitors to save water. Employees are required not to keep the water running when not in use to prevent leaking and dripping.

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於報告期內，有關附屬公司在運作及生產期間所消耗之各種主要資源概列如下：

During the reporting period, the relevant subsidiaries consumed the following resources in the operation and production process:

	單位 Unit	數量 Amount	
		二零一九年 2019	二零一八年 2018
資源			
Resource			
電力	千瓦時	47,917,280	67,391,010
Electricity	Kilowatt Hour		
天然氣	立方米	548,094	1,245,945
Natural Gas	Cubic Metre		
	(千瓦時當量)	5,415,169	12,309,937
	(Kilowatt Hour Equivalent)		
電力及天然氣能耗總量	千瓦時	53,332,449	79,700,947
Electricity and Natural Gas Energy Consumption	Kilowatt Hour		
水	立方米	118,405	175,823
Water	Cubic Metre		
包裝物料(包括紙料、鐵料、木料、塑料等)	公噸	297.36	329.99
Packaging Material (including paper, metal, wood, plastic etc.)	Tonne		

天然氣、電耗和用水較去年有一定幅度的減少，除因為產量有所減少之外，亦得益於本集團進一步加強內控，集中時間段進行生產，優化了生產流程結構，有效降低消耗。

Natural gas, electricity consumption and water consumption decreased to a certain extent compared to last year. On top of reduced production quantity, it was also due to that the Group further strengthened internal control, concentrated production time, optimised production process and effectively reduced consumption.

3.1.3 環境及自然資源

本集團藉教育及宣傳加強員工之環保意識，例如每年都會組織一天無紙化辦公日活動，提倡節約用紙，加強無紙化辦公氛圍。本集團亦積極參與政府舉辦的綠色活動，包括配合政府植樹節活動，在廠區附近公共地段植樹，把保育資源的意識引領到每位員工的心中，形成愛護綠樹的習慣。環境保護的概念同時亦被納入本集團的職工教育培訓綱要內，務求通過本集團的員工將環境保護訊息推廣至各持份者，例如供應商、訪客、銷售客戶等。

本集團確保所選用的物資及生產過程符合國家環保政策及法例，每年均在生產區進行環保檢測，以確保營運狀況符合法律法規。本集團深明保護環境的工作不能局限於本集團內部，供應鏈的配合尤為要。本集團向供應商宣導環境保護的重要性，並要求所有供應商必須遵守所有相關環境法例法規，按法定環境標準行事，建立及遵行環境管理體系，令其營運的環境影響減至最小，並持續改善環境保護水平。

3.1.3 The Environment and Natural Resources

The Group looks to strengthen environmental protection awareness of employees through education and promotions. Paperless Office Day is organised each year to save paper and achieve paperless office. The Group also actively supports the “green” activities held by the government, such as participating in the tree planting activities. Trees are planted in public areas near the plant and employees are encouraged to protect natural resources and establish green plant idea in daily life. The concept of environmental protection has been included into the Group’s employee education and training program, in the hope to promote environmental protection messages to stakeholders such as suppliers, visitors and customers through employees.

The materials selected by the Group, as well as the manufacturing process complies with the environmental protection policies in the country. Environmental audits are conducted in production area each year to ensure that there is no violation. The Group understands that the work of environmental protection should not fall only on the Group internally but the cooperation of the supply chain is equally important. The Group has advocated to suppliers the importance of environmental protection. The Group has requested suppliers to adhere to all relevant environmental laws and regulations and to act in accordance with the relevant environmental standards. The Group has also requested suppliers to establish and follow environmental management systems to minimise the environmental impact during operations and to continuously improve the standard of environmental protection.

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3.2 社會

3.2.1 僱傭

本集團不單兼顧各附屬公司所在地的勞動法規要求，亦制定了完善的薪酬體系及福利政策以保障所有員工獲得公平及合理的待遇。透過互相信賴的僱傭關係以及和諧的工作氛圍，建立起企業穩步向前發展的重要基礎。

1. 平等機會與多元共融

本集團尊重每個人的異同，給予每名工作應徵者相同的應徵權利，提供平等的就業機會，禁止歧視。本集團晉升員工時亦只會參考員工的工作表現、經驗及個人能力，其他與工作無關之因素如性別、年齡、種族、家庭狀況、宗教信仰或殘疾等均不會對員工的晉升機會構成影響。

2. 員工保障及福利

本集團與所有員工簽訂僱傭合約，使彼等受到相關勞工法例的保障。員工享有法定節日、法定帶薪年休假等休假待遇。本集團並為員工購買社會保險，使他們能以較低成本享用醫療服務，又為女職工組織免費婦檢，更進一步為核心人員及年老員工繳納住房公積金。而當不幸遇到因工傷亡事故，本集團定必依循勞動法對員工及家屬作出相應的合理賠償。

3.2 Social

3.2.1 Employment

Not only does the Group comply with local labour laws and regulations, it has also developed sound wage systems and benefit policies to ensure that all employees are treated fairly. It is an important cornerstone for the corporate to develop stably by maintaining harmonious employment relationships.

1. Equal Opportunities, Diversity and Inclusiveness

The Group respects the differences between individuals, forbids any form of discrimination, and provides equal job opportunities to job candidates. Promotions are only based on employees' performance, experience and competence. Other attributes such as gender, age, ethnicity, family status, religion or disability will not be considered.

2. Employee's Protection and Benefits

Employment contracts are signed between the Group and all its employees. All employees are protected by relevant labour laws and regulations. Employees enjoy holiday, statutory paid annual leave, etc. The Group also purchased social insurance for employees so that they can use medical services at a relatively low cost. The Group pays for the Housing Provident Fund for key and senior employees and organises free gynecological examinations for female employees. The Group makes reasonable compensation for employees and their families for work-related injuries and death in accordance with labour law.

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3. 工作生活平衡

本集團重視協助員工減輕工作壓力，提高員工的生活滿足感。員工的身心健康與工作生活的平衡息息相關，而企業的發展又與員工的身心健康密不可分。本集團每年均會舉辦秋季運動會及員工交流會議等活動，讓員工在工餘時間能聚首一堂，藉此提高彼此及單位之間的關係，凝聚員工的團隊精神，營造愉快的工作氛圍。

本集團恪守中華人民共和國勞動法等相關的僱傭法例。於報告期內，本集團並沒收到有關於歧視或招聘的投訴個案。

於報告期末，有關附屬公司員工的總數及分佈概述如下：

3. Work and Life Balance

The Group puts emphasis in helping employees destress, increasing employees' life satisfaction. Maintaining a good work and life balance is essential for employees' physical and mental health, and the corporation development is in turn linked to employees' physical and mental health. Autumn Sports Games, Employee Exchange Conference and other activities are held by the Group each year, which encourage employees to get together outside of work, improve communication among employees and departments, build teamwork and create a pleasant work atmosphere.

The Group has adhered to the Labour Law of the People's Republic of China and other relevant laws. During the reporting period, the Group has not received any complaints regarding discrimination or recruitment.

As of the end of the reporting period, the total number and distribution of employees of the relevant subsidiaries are detailed below:

	員工人數	
	二零一九年 2019	二零一八年 2018
性別 Gender		
男性 Male	277	303
女性 Female	116	128
工作類別 Employment Type		
全職 Full-time	392	430
兼職 Part-time	1	1
年齡 Age		
18 - 30	9	15
31 - 45	144	154
46 - 60	224	237
> 60	16	25
地理區域 Geographic Region		
本省 Local Province	324	358
外省 Other Province	69	73

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3.2.2 健康與安全

保障員工的職業健康與安全是每一間企業的基本責任。本集團積極採取安全機制主動排查隱患、提供保護器具、監察及審核安全表現等方面著手，致力為員工營造一個良好的工作環境，並以工作零事故作為目標。

1. 工作場所管理及保護設備
為協助及提醒員工瞭解各工序的安全操作要點，本集團的各車間及辦公室均有張貼設備安全操作規程及作業指示。同時為減少職業事故發生率及減低事故發生時的嚴重性，本集團亦會為一些相對風險較高的工作崗位提供各類適當的保護設備。
2. 安全監控及員工培訓
本集團為促使員工了解其崗位的潛在職業性危害並做好防預措施，通過組織員工參與職業健康及安全培訓，例如急救演練、事故應對演習等，並張貼崗位職業病危害告示。與此同時，本集團亦通過內聯網每年向員工發放職業危害告知確認書，從而提升員工的安全意識。

本集團恪守包括中華人民共和國職業病防治法等與職業安全健康相關的法例。於報告期內，本集團並未違反任何有關職業健康及安全相關的法律法規，過往三年亦未有任何員工因工作原因而發生死亡情況。於報告期內員工因工傷而損失的工作日共計302天。

3.2.2 Health and Safety

Ensuring the health and safety of employees is a basic responsibility of every corporation. The Group takes the initiative to use an investigation mechanism to identify potential safety hazards, provides protective equipment, monitors and audits safety performance and is striving to achieve the goal of zero work-related accident.

1. Workplace Management and Protective Equipment
In order to remind employees of the safety practices for each process, the Group has posted equipment safety procedures and operation instructions in the workshops and the office areas. So as to reduce the occurrences of occupational accidents and injuries caused by accidents, the Group also provided appropriate protection equipment for high risk positions.
2. Safety Control and Employee Training
The Group helps employees to recognise the potential safety hazards and precautionary measures in their jobs mainly by organising occupational health and safety trainings (such as first-aid drills and incident response drills) and posting occupational hazard signs. The Group also issues Occupational Hazard Acknowledge Letter to employees through the intranet each year to improve their awareness on safety.

The Group has adhered to the Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases and other relevant occupational safety and health laws. During the reporting period, the Group has not violated any occupational safety and health laws and regulations, and there were no employee deaths due to work in the past three years. During the reporting period, a total of 302 workdays were lost due to employee work injuries.

3.2.3 發展及培訓

員工的績效水平是企業生產力的基礎。本集團建立培訓管理制度及培訓計劃，定期為員工提供培訓及進修機會，以提升團隊的職業技能及專業水平。為推動本集團在不同範疇的長期發展，本集團在職業發展政策方面著重關注建立人材梯隊，扶助員工發揮所長，安排有經驗的員工在日常工作期間指導新員工，務求令員工盡快適應本集團的制度與文化。

於報告期間，有關附屬公司員工的培訓時數如下：

3.2.3 Development and Training

The performance standard of employees is the foundation of productivity of a corporation. The Group has established training management systems and training programs and regularly provides training and education opportunities for its employees to improve team's skills and professionalism. In order to promote the Group's long-term development in different areas, the Group's career development policy focuses on sustaining the talent echelon and helping employees to develop their strengths. The Group arranges experienced employees to guide new employees during day-to-day work in order to help employees adapt to the Group's culture.

During the reporting period, the training hours of employee of the relevant subsidiaries is as follows:

	每名員工的平均培訓時數	
	Average number of training hours per employee	
	二零一九年 2019	二零一八年 2018
性別 Gender		
男性 Male	3.55	7.74
女性 Female	2.29	9.75
員工職系 Employee Rank		
高級管理層 Senior Management Level	5.00	42.15
中級管理層 Middle Management Level	4.57	30.18
其他員工 Other Employee	3.05	4.90

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3.2.4 勞工準則

本集團嚴格禁止聘用童工及強制性勞動，僅會聘請符合法定年齡的員工，且尊重既定的工作時間，不會強迫員工超時工作，從而維持一個尊重人權的工作環境。

人力資源部在招聘新員工時，會剔除不滿十八歲應聘者簡歷，並核實其證明文件。自制定規定以來未有發生聘用未成年員工的事件，另一方面人力資源部亦會每月定時查看工作考勤記錄，調查超時工作，確保沒有員工在非自願的情況下超時工作。

3.2.5 供應鏈管理

履行企業責任必須由不同持份者共同承擔及推進。本集團制訂了《中國稀土供應商行為準則》，從法律、禁止貪污賄賂、員工的基本人權、健康與安全、環境保護等各方面向供應商提出了具體的規範要求。為配合本集團的整體營運方針，本集團會要求供應商必須具有執照、環保認證、安全生產認證、職業健康認證等相關資格。本集團又每年定期評估活躍及重要供應商，通過問卷、電郵或會面等形式評定供應商的服務表現是否達到本集團的要求。在符合生產條件及進料標準下，本集團優先採用本地及運輸距離較近的供應商，並會選取最合適運輸方式運送貨品，以期減少廢氣及溫室氣體排放。

於報告期內，本集團活躍供應商有21個來自中國內地，4個來自其他地區。

3.2.4 Labour Standards

The Group strictly prohibits the use of child labour and forced labour. It only employs employees of legal age and never forces employees to work overtime to maintain a work environment that respects human rights.

During the recruitment process, Human Resources Department eliminates candidates who are under the age of 18 years and verifies supporting documents. Since the policy was implemented, no minors have ever been employed. The Human Resources Department also reviews the attendance records on a regular basis. If overtime work is discovered, investigation will be conducted immediately to ensure that employees are not forced to work overtime.

3.2.5 Supply Chain Management

Fulfilling corporate responsibility must be carried out and promoted by different stakeholders together. The Group developed "The Code of Conduct for China Rare Earth Suppliers", which requires suppliers to satisfy with specific requirements relating to compliance with laws, anti-corruption, employees' basic human rights, health and safety, and environmental protection. To align with the Group's overall operational policy, the Group has required suppliers to have qualifications such as licensing, environmental certifications, production safety certifications, and occupational health certifications. Each year, the Group conducts periodic assessments of active and key suppliers to assess whether the suppliers' performance meets the Group's requirements through questionnaires, e-mails or interviews. On the premise of fulfilling production standards and input requirements, the Group prefers local and nearest suppliers and selects the most appropriate transportation tools to ship goods in order to reduce greenhouse gases emission.

During the reporting period, the Group has 21 active suppliers from mainland China and 4 from other locations.

3.2.6 產品責任

產品的質量及安全對企業的聲譽及發展有關鍵影響。為維護客戶權益，本集團的所有產品均嚴格按照合同約定以及危險品相關法律與規定來訂立交貨標準，絕不提供劣質產品。本集團設立了熱線電話及提供現場跟蹤服務，從各方面協助客戶解決產品品質上的問題，提升客戶對本集團產品的信心。本集團亦設立客戶投訴熱線、傳真和電郵的溝通管道，並承諾在接到客戶投訴時，必定在十二小時內向客戶提供滿意答覆。

本集團的生產過程依照ISO9001品質管理體系標準，持續改進品質管理。本集團只向合格供應商採購原材料，確保生產材料優良。若出現技術方面的問題，技術部將會牽頭處理，如有需要改進產品質素的相關事項，則由技術部聯同生產部依照內部控制程式進行處理，並將產品質素改進的信息交由銷售部向顧客及時傳遞。售出的產品若出現品質問題，本集團會負責產品的回收及與客戶協商後續跟進安排。於報告期間，本集團已售或已運送的产品並未有因安全與健康理由而須作回收，亦未有成立的投訴。

3.2.6 Product Responsibility

Product quality and safety have a direct impact on reputation and development of a corporation. To safeguard customers' interests, all of the product delivery standards are set up according to relevant contracts and laws and regulations regarding hazardous goods. The Group never provides products with poor quality. To improve customers' confidence in the Group's products, the Group has set up a hotline and on-site tracking services to help customers solve product quality issues. The Group has also set up a customer complaint hotline, as well as communication channels through fax and e-mail. Customer complaint must be resolved within 12 hours upon the receipt of the complaint.

The Group's production process complies with the ISO9001 Quality Management System, and continuously improves the quality management. All raw materials are of high quality and are provided by qualified suppliers. If there are technical problems, the Technical Department takes the lead in addressing the problems. If it is necessary to improve product quality, the Technical Department will address the issue in accordance with the internal control procedures together with the Production Department, and will also submit the quality improvement information to the Sales Department so that the customer can be informed in a timely manner. If there are quality issues for the products sold, the Group will be responsible for recalling the products and negotiating with the customer for follow-up arrangements. During the reporting period, the products sold or shipped by the Group have not been recalled for safety and health reasons, and no valid complaint has been received.

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本集團重視保障客戶私隱，制定了消費者資料保障及私隱政策，未經客戶允許絕不會將客戶資料用於宣傳用途。所有客戶資料皆按照檔案管理要求進行嚴格保管，保密級別分為普通、機密、絕密，且根據保密級別不同，保密要求亦不同。紙質材料則有專人保管，獲得授權查閱資料的人員必須進行備案登記，而電腦系統內的資料將根據保密要求而設置相應等級的授權級別及查詢密碼。

本集團亦十分重視維護及保障知識產權，所有涉及圖紙的版權的產品生產過程，均須得到版權持有人授權同意後方可使用。本集團承諾不會購買或使用盜版產品，拒絕採用未經授權的圖像或設計。

3.2.7 反貪污

本公司的董事會成員來自各個背景，共同監管本公司的管治政策。本集團要求所有員工均不得行賄，亦杜絕一切受賄行為，與政府官員及業務單位經辦人交流時須注意言行以免引起誤會。本集團所有物料採購均依據《採購招標管理制度》，所有以合約方式有償取得物資、工程及勞務的行為、購買、租賃、委託等，必須採用公開招標形式。評價及考核以投標方的資質情況、最終採購物資的質、量、價、運送時間等各方面因素作為標準。

The Group values protection of customer confidentiality and has developed a customer data protection and privacy policy. Customer information will not be used for promotional purposes without their permission. All customer information is in strict control with the file management requirements. The requirements for confidentiality are different for information with different confidentiality levels, which are divided into regular, confidential and top secret. Paper documents are managed by designated personnel and people who have been authorised to review the documents must make relevant records. Information in computer system is protected with query password and authorisation functions based on its confidentiality levels.

The Group also pays great attention to the maintenance and protection of intellectual property rights. If a product involves any copyright issue during the production process, it is required to obtain the consent of the owner before use. The Group is committed not to purchasing pirated products and not to use images or designs that are not authorised.

3.2.7 Anti-corruption

Board members of the Company are come from various background, and they supervise the Company's governance policy collectively. The Group has required that all employees not to be subject to bribery and to pay attention to words and actions when corresponding with government officials and business unit managers to avoid misunderstandings. The Group has developed the Procurement and Bidding Management System for procurement of materials. Public bidding must be performed for all of the Group's procurement activities, including all materials, projects and labour outsourced, purchased, leased and commissioned through contracts. The bidders' qualifications, the quality, quantity, price and delivery timeframe of the materials purchased at the end are used as the evaluation and assessment criteria.

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本集團亦設立了員工舉報機制，通過信箱、微信、電話等管道反映及舉報不當行為。本集團在接到舉報後兩天內著手調查，並將調查結果匯報給本集團人事部副總裁以及向舉報人通佈，而所有的舉報個案均會存檔並做保密處理。

本集團委託獨立審核機構對帳目進行半年度及整年度審核，確保本集團的賬目正確，保障股東的利益，同時亦會根據獨立審核機構提出的建議改善財務內部監控制度。

報告期內未有貪污案件發生。

3.2.8 社區投資

本集團會積極參與及支持本地社區及政府部門組織的活動，肩負改善環境、社會及管治表現之責任，致力成為一家備受各方認可的可持續企業。

The Group also set up a reporting mechanism for employees. The Group provides employee with reporting channels include mailboxes, WeChat and telephone to report unfair treatment encountered at work. Upon receipt of the report, the Group promises to investigate within two days. The results of the investigation will be submitted to the Group's Vice President in Human Resources Department as well as to the reporters. All reporting cases will be documented and kept confidential.

The Group has hired an independent audit organisation to conduct semi-annual and annual audits on the Group's accounts in order to ensure that the Group's accounts are accurate and the interests of the shareholders are protected. It also improves the financial internal control system based on recommendation suggested by the independent audit organisation.

There was no corruption case in the reporting period.

3.2.8 Community Investment

The Group would actively participate and support events organised by the local community and government department. The Group would also take on the responsibility of improving on the environmental, social and governance performance, and strive to be a sustainable corporation that is recognised by all.



中國稀土控股有限公司

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