

SILVER GRANT INTERNATIONAL HOLDINGS GROUP LIMITED 銀建國際控股集團有限公司 ^{股份代號 Stock code: 171}

> Environment, Social and Governance Report

2019

Contents

About This Report	2
Environmental, Social and Governance Management Approach	4
Stakeholder Engagement	5
Materiality Assessment	6
Environmental Subject Area	7
Overview	7
Emissions	7
Use of Resources	11
The Environment and Natural Resources	14
Social Subject Area	15
Employment and Labour Practices	15
Employment	15
Health and Safety	19
Development and Training	20
Labour Standards	21
Operating Practices	22
Supply Chain Management	22
Product Responsibility	24
Anti-corruption	26
Community	26
Community Investment	26
The Stock Exchange "Environmental, Social and Governance Reporting Guide" Index	27

About This Report

Silver Grant International Holdings Group Limited (the "**Company**" or "**Silver Grant**", together with its subsidiaries, collectively the "**Group**") is pleased to present its Environmental, Social and Governance Report (the "**Report**"), which sets out the Group's policies, measures and performance on its key environmental, social and governance ("**ESG**") issues for the year ended 31 December 2019.

Reporting period

The reporting period of this Report is from 1 January 2019 to 31 December 2019 (the "**reporting period**" or "**2019**").

Reporting scope

Based on the relevance of their financial materiality to the Group's ESG strategies, this Report covers the business segments of the Group as follows:

• Investments business

During the reporting period, the Group operated its investments business through its offices in the People's Republic of China (the "**PRC**") and the Hong Kong Special Administrative Region of the PRC ("**Hong Kong**").

• Property leasing business

During the reporting period, the only property leased out by the Group under its property leasing business was the East Gate Plaza (the "**plaza**"), a property located in Beijing which was managed by a thirdparty property management company (the "**Property Manager**"). The key performance indicators of the plaza are not disclosed in this Report as the plaza is not controlled or managed directly by the Group. Nonetheless, the operation of the plaza, in particular, the initiatives taken to reduce the impact of the plaza on the environment are set out in certain sections in this Report to give a comprehensive view to the Group's stakeholders on the ESG matters relating to the Group.

Compared with the Company's ESG report prepared for the year ended 31 December 2018 (the "**2018 ESG Report**"), the trading of petrochemical products and provision of sub-contracting service business segment (the "**Petrochemical Business**") has been excluded from this Report, given that the Group had discontinued its operation of the Petrochemical Business following the completion of the merger and restructuring of its two entities in Taizhou in the PRC in July 2019, which were involved in the operation of this business segment.

For the purpose of ESG reporting, the Group will continuously upgrade its internal data collection procedures and improve the scope of its disclosure. If the scope of the specific content of this Report is different from the above, it has been specifically noted in the relevant sections.

About This Report (Continued)

Reporting basis and principle

This Report is 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 (the "**Main Board Listing Rules**") on The Stock Exchange of Hong Kong Limited (the "**Stock Exchange**"). The Group has complied with all "comply or explain" provisions set out in the ESG Guide and this Report was prepared based on the four reporting principles: materiality, quantitative, balance and consistency.

Materiality

The ESG issues that are important to the Group have been included in this Report. The Group determined the significance of the ESG issues by way of stakeholder engagement and materiality assessment, further details of which are provided in the sections headed "Stakeholder Engagement" and "Materiality Assessment" of this Report.

Quantitative

Information is presented with quantitative measures, whenever feasible, including information on the standards, methodologies, assumptions used and provision of comparative data.

• Balance

In this Report, information is disclosed by the Group in such a manner to avoid unfair selections, omissions, or presentation formats that may inappropriately influence the decisions or judgment of the readers of this Report.

Consistency

The Group is committed to using consistent methodologies for meaningful comparison. Where necessary, the Group discloses changes to the methods used or any other relevant factors affecting a meaningful comparison.

Information contained in this Report is derived from the Group's internal documentation and a summary of control, management and operational information provided by the relevant subsidiaries of the Company in accordance with the Group's internal management system. The last section of this Report is accompanied by a complete content index for quick reference. This Report is prepared and published in both Chinese and English and is available on the website of the Stock Exchange (www.hkexnews.hk) and the Company's website (www. slivergrant.com.hk). If there is any conflict or discrepancy in the Chinese and English versions, the Chinese version shall prevail.

About This Report (Continued)

Information and feedback

The Group values your comments on this Report. Should you have any comments or suggestions, you are welcome to send them by email to the following address: cs@silvergrant.com.hk.

Environmental, Social and Governance Management Approach

As a responsible corporate citizen, the Company is committed to sustainable development and adheres to its social responsibility to fulfil and strike a balance among the interests of its stakeholders in economic, environmental, social and corporate governance areas while carrying on its business. The Group aims to truthfully disclose its ESG responsibilities and performance. The Group is committed to integrating environmental and social elements into its decision-making process.

The Board supports the Group's commitment to fulfilling its environmental and social responsibilities and has overall responsibility for the Group's ESG governance. The Board evaluates and determines the Group's ESG-related risks and opportunities and oversees the Group's ESG management approach, strategy, priorities and objectives.

The Board has delegated the day-to-day responsibility of the implementation of ESG strategies to the senior management and department heads of the Group. Senior management advises the Board on policy formulation and monitors the Group's ESG performance and targets. Department heads implement the ESG policies and the related initiatives. The Board regularly reviews the Group's ESG performance, and the Group's annual ESG reports.

Stakeholder Engagement

Stakeholders' opinions provide a foundation for the sustainable development and success of the Group. Stakeholder engagement helps the Group to develop business strategies that are more in line with the needs and expectations of the stakeholders, enhance its ability of risk foresight and strengthen its relationships with its major stakeholders. In its day-to-day operations, the Group actively seeks to understand the ESG concerns of its stakeholders through different communication channels. The Group's major stakeholders and the communication channels between them and the Group are as follows:

Stakeholders	Expected concerns	Communication channels		
Government and regulatory bodies	 Compliance of operation Regional economic development and employment Disclosure and transparency 	Annual and interim reports and other public information		
Shareholders and investors	 Return on investment Compliance of operation Disclosure and transparency Protection of shareholders' rights and interests and fair treatment 	 Annual general meeting and other general meetings Annual results announcements Annual and interim reports and other public information Websites of the Company and the Stock Exchange 		
Employees	 Employee remuneration and benefits Health and safety Career development 	 Staff training Monthly work meetings Departmental meetings and team meetings Employee activities 		
Customers or lessees	Service qualityBuilding safetyPersonal data protection	 Customer services hotline Day-to-day communication with frontline staff 		
Suppliers	Fair and open procurementSupplier selection and evaluation	Email and telephoneSupply management system		
Community	Community engagementSocial responsibilitiesEnvironmental compliance	Community activitiesEmployment opportunities		

Materiality Assessment

The Group has conducted a materiality assessment survey to determine the ranking of the ESG issues relating to the Group. By considering the dependency and influence of the stakeholders on the Group and the availability of the resources of the Group, management identified the key stakeholders of the Group and invited them to participate in the survey. The key stakeholders who participated in the survey provided the Group with their comments and suggestions on the ESG issues related to the Group's operations through the survey. After integrating the results of the Group's internal assessments and those of the survey, the Group concluded on the integrated results with a materiality matrix. The Group determined the extent of disclosure of the ESG issues in this Report based on the importance of the issues to both the Group and its stakeholders as shown in the matrix below.

Relatively Important to Stakeholders

- Diversity and Equal Opportunties
- Employee Right Protection
- Socioeconomic Compliance
- Child Labour and Forced Labour Protection
- Employee Retentior
- Waste Management
- Environmental Compliance
- Customer Privacy and Corporate
 Information Protection
- Service Quality
- Intellectual Property

Relatively Important to Both Stakeohlders and the Group

- Anti-discrmination
- Occupational Health and Safety
- Business Ethiccs
- Staff Development and Training
- Customers' Health and Safety

Relatively not Important to Both Stakeholders and the Group

Water Efficiency

Relatively Important to the Group

- Supply Chain Managemnet
- Marketing and Labelling
- Air Emissions
- Environmental Imapct Mititgation
- Community Investment
- Energy Efficiency
- Greenhouse Gas Emissions
- Use of Resources
- Climate Change

6

Environmental Subject Area

Overview

In 2019, the Group's main businesses were investments and property leasing, which were operated by the Group through its offices. The management of the plaza under the Group's property leasing business has been outsourced to a third-party property management company (i.e. the Property Manager). The environmental impact of the Group's operations came mainly from the energy consumption of the Group's offices, including lighting, air conditioning and other equipment. There were no significant emissions or waste emissions from the operation of the offices. As such, the negative impact of the Group's businesses on the environment was relatively low, resulting in there being fewer environmental-related issues of great concern to the Group and its stakeholders. Nonetheless, the Group is committed to continuously improving its environmental performance and minimising the potential negative impact of its business operations on the environment.

Emissions

As the office is the main type of operating premises of the Group which does not generate significant emissions as discussed above, the Group is not aware of any environmental laws and regulations in relation to emissions that had a significant impact on the Group during the reporting period. However, the Group will continue to monitor the development of the relevant local environmental laws and regulations. The Group is highly concerned with the impact and potential risks of its operations on the environment and the surrounding ecosystems and is committed to operating in an environmentally friendly manner.

Air emissions

Air emissions¹ of the Group, which include nitrogen oxides, sulphur oxides and particulate matters, are mainly generated from its vehicles. To control and reduce the related emissions the Group has monitored its vehicle mileage and fuel consumption to keep abreast of the actual usage of its vehicles to ensure their effective use. Compared with last year, there were no significant changes in the emission amounts in 2019. Going forward, the Group will continue to refine its data collection system and review and improve its emission reduction strategies as and when appropriate.

	2019	2018
	tonnes	tonnes
Nitrogen oxides (NO _x)	0.0121	0.0124
Sulphur oxides (SO _x)	0.0000	0.0001
Particulate matter (PM)	0.0009	0.0009

There were no air pollutant emissions from business units in Beijing and Guangzhou. The relevant emissions were form the business units in Hong Kong.

Environmental Subject Area (Continued)

Greenhouse gas (GHG) emissions

The Group is committed to taking positive actions to address climate change issues and to reduce the risk of climate change for the society in the most effective way. The Group has taken actions to reduce the GHG emissions from the operations of its business and implemented energy-saving measures described in the section headed "Use of Resources" of this Report. The Group has implemented energy-saving measures in its offices to reduce power consumption and indirect GHG emissions.

During the reporting period, the Group's main sources of GHG emissions included electricity consumption from its buildings and equipment and fuel consumption by its vehicles. Compared with the GHG emissions of 386.59 tonnes CO_2 equivalent (tonnes CO_2 -e) and their intensity of 0.18 tonnes CO_2 -e per square metre (sq. m) in 2018, the GHG emissions and their intensity were 287.02 tonnes CO_2 -e and 0.11 tonnes CO_2 -e/ sq.m in 2019, representing decreases of 26% and 35% respectively. This is mainly due to a decrease in the number of company vehicles used by the Group in 2019 compared with the previous year.

Looking ahead, the Group will continue to record and monitor its GHG emissions, improve its relevant data collection systems and, where appropriate, develop targets and emissions reduction plans.

Environmental Subject Area (Continued)

Greenhouse gas (GHG) emissions (Continued)

GHG emissions² data of the Group is as follows:

	2019 tonnes CO₂-e	2018 tonnes CO₂-e
Beijing ³		2
Scope 1	-	-
• Scope 2 ⁴	232.73	331.86
Sub-total	232.73	331.86
Intensity (per square meter)	0.30	0.21
Hong Kong		
Scope 1	5.56	30.35
Scope 2	21.94	24.38
Sub-total	27.50	54.73
Intensity (per square meter)	0.07	0.09
Guangzhou⁵		
Scope 1	-	N/A
Scope 2	26.79	N/A
Sub-total	26.79	N/A
Intensity (per square meter)	0.02	N/A
Total	287.02	386.59
Intensity (per meter square)	0.11	0.18

Remarks:

Scope 1 refers to the direct GHG emissions from the business operations owned or controlled by the Group, including the emissions from the Group's vehicle fleet and fuel combustion.

Scope 2 refers to the "indirect energy" GHG emissions from the internal consumption of purchased electricity, heat and steam by the Group

² The calculation of the GHG emissions data is made with reference to the "Greenhouse Gas Protocol: Corporate Accounting and Reporting Standards", "How to prepare ESG reports? Appendix 2: Reporting Guide to Environmental KPIs" issued by the Stock Exchange, the sustainability reports issued by the HK Electric Investments and HK Electric Investments Limited and The Hong Kong and China Gas Company Limited and "Average CO2 Emission Factor of China's Regional Power Grids in 2011 and 2012" published by the National Development and Reform Commission of the PRC.

³ The plaza is managed by third-party companies and therefore the relevant data is excluded. The data only covers the Group's office in Beijing.

⁴ GHG emissions data in relation to purchased heat should be calculated based on the heat consumption amount. However, for the purchased heat that it has consumed, the Group's business unit in Beijing was charged based on the area of its offices instead of the heat consumption amount. Therefore, the related emissions data has been excluded from this Report.

⁵ The Guangzhou business unit was not included in the scope of the 2018 ESG Report and therefore did not report the relevant data.

Environmental Subject Area (Continued)

Waste

The main types of waste generated by the Group include household waste and office paper. In 2019, the Group did not have any significant amount of hazardous waste produced or hazardous waste required to be disposed of. The Group encourages the recycling and use of environmentally friendly stationery, paper conservation and energy conservation in order to make more efficient use of resources and reduce waste.

The amount of non-hazardous waste generated by the Group is as follows:

	2019	2018 ⁶
	tonnes	tonnes
Office paper	0.30	N/A
Intensity (per employee)	15.14	N/A

Sewage discharge

The sewage discharged from the plaza mainly comes from its toilets and kitchens. The Property Manager handles the sewage of the plaza in accordance with the laws and regulations of the local government, and the relevant measures taken are as follows.

• Treated greywater

Used water collected from bathrooms, washbasins, kitchen sinks, etc. is called greywater. Sewage collected from different sources of the plaza, including toilets, staff bathrooms, cooling water and machine leaks, is delivered to the greywater system for treatment. The treated water will be used in the toilets and urinals of the commercial section of the plaza, irrigation and car washing.

• Toilet sewage

Toilet and urinal sewage is discharged directly into outdoor septic tanks, which are regularly cleaned by third-party companies.

• Food and beverage sewage

Food and beverage sewage is treated through oil tanks so that the used oil can be effectively separated from the sewage before being discharged into the sewers, which are regularly cleaned by third-party companies.

The figures were not reported until 2019.

Environmental Subject Area (Continued)

Use of Resources

The Group is committed to the promotion of the effective use of energy, water, paper and other natural resources in its day-to-day operations.

Energy use

Energy-efficient office

The Group attaches great importance to energy conservation and emissions reduction, and has promoted energy saving through announcements in its offices and department and team meetings, which remind its employees to turn off the lights, control air conditioning temperature, etc., to enhance the awareness of employees on electricity saving.

Compared to the total energy consumption of 463.52 milliwatt-hour (MWh) and the intensity of 0.21 MWh per sq.m in 2018, the Group's total energy consumption in 2019 was 319.11 MWh and 0.13 MWh per sq.m, representing decreases of 31% and 40% respectively. This was attributed to the decrease in the use of motor vehicles and electricity by the Group compared with the previous year.

Looking ahead, the Group will continue to record and monitor its energy consumption, improve its relevant data collection systems, and, where appropriate, develop targets and energy-saving plans.

The use of energy data of the Group is as follows:

	2019 <i>MWh</i>	2018 ⁹ <i>MWh</i>
Beijing ⁷		
Purchased electricity	240.43	375.28 ⁸
Sub-total	240.43	375.28
Intensity (per square meter)	0.31	0.24
Hong Kong		
Petrol	19.24	54.44
Purchased electricity	27.43	30.29
Purchased Towngas	-	3.51
Sub-total	46.67	88.24
Intensity (per square meter)	0.12	0.16
Guangzhou ⁹		
Purchased electricity	32.01	N/A
Sub-total	32.01	N/A
Intensity (per square meter)	0.03	N/A
Total	319.11	463.52
Intensity (per square meter)	0.13	0.21

⁷ The plaza is managed by third-party companies and therefore the relevant data is excluded. The data only covers the Group's office in Beijing.

⁸ GHG from purchased heating is calculated based on the heat consumption amount. However, the heating was charged based on the area of offices instead of the heat consumption amount. Therefore the related data were excluded.

⁹ GHG emissions data in relation to purchased heat should be calculated based on the heat consumption amount. However, for the purchased heat that it has consumed, the Group's business unit in Beijing was from this Report charged based on the area of its offices instead of the heat consumption amount. Therefore, the related emissions data has been excluded from this Report.

Environmental Subject Area (Continued)

Energy use (Continued)

Energy saving at the plaza

The Property Manager has implemented the following energy-saving measures to reduce electricity and heat energy consumption at the plaza:

- Clean hot water tanks to improve heat exchange efficiency and reduce heat and electricity consumption;
- Require newly renovated tenants to install remote transmission energy meters and upload energy consumption data to facilitate the Property Manager to analyse the data;
- According to the outdoor temperature and humidity, automatically adjust the start-up time of the chillers and switch the operation of the different units of the chillers interchangeably so as to avoid the uncertainty of the traditional manual switch and reduce the consumption of water and electricity; and
- Provide energy management training to the employees of the Property Manager, install energy meters by phase to build an energy management platform, and perform monthly statistical analysis of the data collected from the energy meters.

Water resources

Office water uses

The Group's investments business is not dependent on water resources. Water is mainly used by the employees of the Group for day-to-day domestic purpose and is supplied by water companies, so there is no issue in sourcing applicable water resources fit for the purpose of the Group. Nonetheless, the Group understands that water resources are one of the most precious natural resources on earth and has always attached great importance to the rational use of water resources and strived to reduce non-essential water consumption. The Group has put up announcements and water-saving slogans in its offices to encourage its employees to save water.

During the reporting period, the water consumption of the Beijing office was 1,773 tons, representing a decrease of 52% compared to 3,673 tonnes of water consumption in 2018. Looking ahead, the Group will continue to improve its data collection system and review and improve its water consumption efficiency when appropriate.

Environmental Subject Area (Continued)

Water resources (Continued)

Office water uses (Continued)

The data of water usage in the offices of the Group is as follows:

	2019	2018
	tonnes	tonnes
Beijing		
Total	1,773	3,673
Intensity (per employee)	80.59	166.95
Hong Kong ¹⁰		
Total	-	166
Intensity (per employee)	-	13.38
Guangzhou		
Total	N/A ¹¹	N/A ¹²
Intensity (per employee)	N/A	N/A

Plaza water uses

The water usage in the plaza is managed in accordance with the "Beijing City Provisions of Water Conservation Measures" issued by the Beijing government. Water is supplied by the municipality of Beijing. The water used by the garage and shopping mall portion (i.e. B2-3 floors) of the plaza is provided directly by the municipal, that used by the office portion (i.e. 4-10 floors) is supplied by a negative-pressure equipment installed in the plaza, and that used by the apartment portion is supplied by a domestic water tank through a booster pump installed in the plaza.

The Property Manager analyses the consumption data collected from the water meters to identity and fix the abnormalities in a timely manner, so as to improve water consumption efficiency. The Property Manager has taken relevant measures to improve water efficiency at the plaza:

- The start-up time of the chillers is automatically adjusted and the operation of the different units of the chillers is switched interchangeably based on the outdoor temperature and humidity. These measures have reduced the uncertainty of the manual operations experienced in the past, which have in turn reduced the consumption of water and electricity.
- The installation of an automatic monitoring system in the greywater system allows the equipment to start and stop operations automatically. This system reduces the frequencies of patrols and inspections and improves water efficiency.

¹⁰ The water consumption covers the Group's staff quarters in Hong Kong only. In 2019, as the staff quarters were vacant, there was no water consumption recorded.

¹¹ The Guangzhou business unit did not have to pay for its water consumption, therefore, its water consumption data in 2019 was not available.

¹² The Guangzhou business unit was not included in the scope of the 2018 ESG Report, so no relevant data was reported.

Environmental Subject Area (Continued)

Water resources (Continued)

Plaza water uses (Continued)

- Regular inspection of the urinal and toilet sensors. If the failure of the sensors is identified, maintenance will be carried out promptly.
- Environmentally friendly strong alkaline electrolytic ionized water instead of traditional chemical cleaners is used to clean the plaza. The product is colourless, odourless, washed, sterilised, free of foam and residue, and can be easily rinsed, thereby reducing rinse time and water consumption.

Other resources

The businesses of the Group do not involve the production of products and therefore the Group has no procurement and use of raw materials and packaging materials.

The Environment and Natural Resources

The Group's business activities have a limited impact on the environment and natural resources, mainly from the consumption of electricity and water resources by the Group. Although such consumption has no direct and significant impact on the environment or natural resources, the Group actively promotes environmental protection in different ways. In 2019, in addition to the energy and water saving initiatives taken as discussed above, the Group also promoted awareness of energy conservation among its employees and encouraged them to actively participate in tree planting activities organised by the Federation of Trade Unions of Foreign-invested Enterprises.

Social Subject Area

The Group is committed to maintaining a high level of corporate social governance as it is essential to its safe and healthy working environment, good service quality and social reputation. At the same time, the Group is committed to maintaining the sustainability of its business and the communities in which it operates. The Group carefully manages its businesses and executes management decisions in a prudent and focused manner to drive its business model.

Employment and Labour Practices

Employment

The Group firmly believes that employees are the most important assets of an enterprise. To support its business growth, the Group must build sustainable human capital to attract and retain outstanding talent. The Group has formulated and implemented a series of human resources policies. For example, the Group's "Personnel Management System" and "Employee Manual" set out a series of guidelines and procedures for the personnel management of the Group's business units in Hong Kong. Chapter VII of "Interim Management Measures of Silver Grant International" and "Employee Grading and Salary Management Measures" set out the principles for personnel management and provides specific procedures for salary management for the Group's business units in Mainland China.

Recruitment, compensation, promotion and dismissal

The Group recruits its employees by strictly abiding by the principle of meritocracy and virtue. Employee wages are adjusted from time to time by the Group based on factors, such as the Group's operating conditions and the increase in the regional price index. The Group has also set up promotion and reward systems to encourage its employees to make contributions. The Group handles the dismissal of its employees in accordance with the labour laws and regulations of Hong Kong and Mainland China.

Working hours and holidays

The working hours of the staff of the Group are prescribed in accordance with the relevant local employment laws and are set out clearly in their individual employment contracts. In addition to statutory holidays, the employees are also entitled to maternity leave, marriage leave, bereavement, paternity leave and compassionate leave.

Equal opportunities, diversity and anti-discrimination

The Group is committed to creating a fair, respectful and diverse working environment by promoting antidiscrimination and equal opportunity in terms of all human resources and employment decisions, for instance, training and promotion opportunities, as well as hiring, performance evaluation and payroll calculation processes irrespective of the employees' race, religion beliefs, skin colour, nationality, age, disability or any other non-job related factors in all its business units.

Employment and Labour Practices (Continued)

Employment (Continued)

Equal opportunities, diversity and anti-discrimination (Continued)

The Group's employee handbook states that in accordance with the Code of Practice and Legal Guidelines issued by the Equal Opportunities Commission for the purpose of eliminating discrimination and promoting equal opportunities at the workplace, employees in Hong Kong should comply with regulations including the Sex Discrimination Ordinance (Chapter 480 of the Laws of Hong Kong), Disability Discrimination Ordinance (Chapter 480 of the Laws of Hong Kong), Disability Discrimination Ordinance (Chapter 487 of the Laws of Hong Kong), Family Status Discrimination Ordinance (Chapter 527 of the Laws of Hong Kong) and Race Discrimination Ordinance (Chapter 602 of the Laws of Hong Kong). Employees who violate any of the above regulations or who commit defamation will be subject to disciplinary and legal punishments.

The Group strictly prohibits any discrimination or sexual harassment. Employees who encounter related incidents may file complaints with their department head or the human resources department of the relevant entities in the Group. All complaints are handled in top secret.

Other welfare and benefits

The Group provides compulsory provident funds, medical insurance, dental insurance, etc. to its employees in Hong Kong, and it also purchases various insurance plans for its employees in Mainland China, including pension insurance, medical insurance, unemployment insurance, work injury insurance, maternity insurance and housing provident fund. In addition to the above-mentioned benefits provided to its employees in accordance with local regulations, the Group will also provide other allowances to its employees according to the circumstances, including lunch benefits, holiday fees, birthday fees, heatstroke prevention or heating subsidies, etc.

Talent is essential to the business development of the Group and for the Group to maintain its competitiveness. The Group has established an effective communication system between its management and employees to ensure that its management can listen to voices at the grassroots level and that each employee is respected and cared for. The Group hopes to use this to inspire its employees and enhance cohesion among them. Different types of communication channels are provided by the Group to its employees, including internal calls, emails, bulletin boards and real-time communication software. The smooth communication between its employees and management is conducive to the Group's implementation of comprehensive and effective decision-making and the establishment of harmonious and friendly relationships among its employees. In order to cultivate employees' sense of belonging, the Group has regularly held activities for its staff, such as birthday parties and leisure trips.

Employment and Labour Practices (Continued)

Employment (Continued)

Other welfare and benefits (Continued)

Compliance information on relevant laws and regulations

In 2019, the Group has complied with the laws and regulations relating to labour and social security in Mainland China and Hong Kong, including but not limited to:

- Labour Contract Law of the People's Republic of China
- Labour Law of the People's Republic of China
- Provisional Regulations on the Collection of Social Insurance Premiums
- Housing Provident Fund Management Regulations
- Employment Ordinance (Chapter 57 of the Laws of Hong Kong)
- Sex Discrimination Ordinance (Chapter 480 of the Laws of Hong Kong)
- Disability Discrimination Ordinance (Chapter 487 of the Laws of Hong Kong)
- Family Status Discrimination Ordinance (Chapter 527 of the Laws of Hong Kong)
- Race Discrimination Ordinance (Chapter 602 of the Laws of Hong Kong)

Violation of the above laws and regulations may result in fines, civil and/or criminal consequences, and seriously affect the Group's relationship with its employees. The Group has developed a series of human resources policies and actively refined them to ensure that the rights and interests of its employees are protected in accordance with the relevant laws and regulations. The Group is not aware of any violations of laws and regulations that had a significant impact on it during the reporting period.

Employment and Labour Practices (*Continued***)**

Employment (Continued)

Employee Composition

As of 31 December 2019, the Group employed a total of 96 employees in Hong Kong and Mainland China, with the employee composition as follows:

	2019
By Gender	
Male	53
Female	43
By Age Group	
• 30 below	29
• 30 – 50	59
• 50 above	8
By Employment Category	
Full time	96
Part-time	0
By Geographical Location	
Hong Kong	9
Mainland China	87
Total	96

Employee turnover rate

The Group's employee turnover rate in 2019 is as follows:

		2019
	Turnover Rate ¹³	Turnover
By Gender		
• Male	8%	4
• Female	5%	2
By Age Group		
• 30 below	0%	0
• 30 – 50	10%	6
• 50 above	0%	0
By Geographical Location		
Hong Kong	0%	0
Mainland China	7%	6
Overall	6%	6

¹³ Turnover rate = (Total number of employees in the specified category who left employment during the reporting period / Total number of employees in the specified category at the end of the reporting period) *100%

Employment and Labour Practices (Continued)

Health and Safety

As the Group's operation is mainly taking place in its offices, the Group is exposed to a lower risk in relation to occupational safety and health than an enterprise which mainly operates through other types of workplace, such as factories and construction sites. Nonetheless, the Group is committed to providing a safe and healthy working environment for all its employees, contractors, customers and those who visit or perform their duties at the Group's premises. The Group has actively provided adequate and appropriate orientation, instructions and training to enable its employees at all levels to perform their duties safely and efficiently, and to promote employee participation in maintaining a safe working environment. The Group protects the health and safety of its employees in its Hong Kong office by referring to the guidelines issued by the Occupational Safety and Health Council. For example, the Group's office in Hong Kong is well lit and well ventilated at all times. The Group's business units in Mainland China have implemented various measures to promote the health of their employees, including arranging medical examinations of all staff annually, regular disinfection of the workplace, hiring professional evaluation agencies to assess and eliminate harmful substances from newly renovated offices, and promoting the concept of "Hard working and happy life", creating a healthy, harmonious working atmosphere, and organising all kinds of fun competitions.

Compliance information on relevant laws and regulations

The Group is required to comply with relevant labour laws and regulations in relation to employees' health and safety, including but not limited to:

- "Labour Safety and Health", Chapter VI of the Labour Law of the People's Republic of China
- Employees' Compensation Ordinance (Chapter 282 of the Laws of Hong Kong)
- Occupational Safety and Health Ordinance (Chapter 509 of the Laws of Hong Kong)

Violation of the above laws and regulations may result in fines, imprisonment, civil and/or criminal consequences. The Group is not aware of any violations of laws and regulations that had a significant impact on it during the reporting period. In addition, the Group is not aware of any cases of work-related injuries and/or deaths during the reporting period.

Employment and Labour Practices (Continued)

Development and Training

The Group attaches great importance to the career development of its employees and encourages its employees to continue their education. The Group provides continuous training to its employees according to the needs of its business development.

Investments business

Given that non-performing asset management has become a focus of the Group's investments business and practitioners of non-performing asset management need to have extensive financial, legal and accounting knowledge and communication skills, the Group has provided different types of internal and external training to the staff engaged in its investment business. In 2019, while the internal training provided by the Group included leadership experience sharing and on-the-job training, the external training provided by the Group mainly included industry seminars, which allowed its employees to learn more about industry theories. Most of the employees in the Group's investments business have three or more years of experience in non-performing asset management, and for those with only financial industry experience, the Group has provided more training to them on the non-performing assets business to allow them to adapt to the non-performing asset management business, unleash their own potential and contribute to the Group as soon as possible.

Property leasing business

In relation to its property leasing business, the Group formulates annual training plans of different forms, levels and methods according to the annual, quarterly and monthly plans. The types of training includes management training organised by the Group, special training organised by professional technical committees of the Group, on-the-job training of individual departments of the Group, and employee care skills training. In addition, certified employees received regular external audit training.

Percentage of employees trained

During the reporting period, the Group provided training to 58 employees in 2019, accounting for 61% of the total number of its employees. The breakdown of the total trained employees by gender and employee category is as follows:

	Number of Employees	2019
	Trained	Percentage
By Gender		
• Male	31	53%
Female	27	47%
Total	58	100%
By Employee Category		
Management	4	7%
Middle Management	9	16%
General Staff	45	78%
Total	58	100%

Employment and Labour Practices (Continued)

Development and training (Continued)

Average training hours completed per employee

During the reporting period, the Group provided a total of 2,414 training hours to its employees. The average number of training hours per employee completed by gender and employee category in 2019 is as follows:

		2019
	Total Training	Average
	Hours	Training Hours ¹⁴
By Gender		
• Male	1,523	28.74
• Female	891	20.72
By Employment Category		
Senior Management	333	33.30
Middle Management	926	66.14
General Staff	1,155	16.04
Overall	2,414	25.15

Labour Standards

The Group's businesses are operated mainly in Hong Kong and Mainland China, while the majority of its suppliers are intermediate agencies. Both of the Group and its suppliers do not involve in labour-intensive activities such as manufacturing in general. Therefore, the Group did not identify any businesses and/or suppliers that are considered to expose the Group to significant risks relating to incidents of child and forced labour in terms of the nature and geographical location of businesses and suppliers of the Group. The issue of child and/or forced labour does not have a significant impact on the Group.

In recruiting employees, the human resources department of the relevant entity in the Group reviews the personal data of each candidate in accordance with relevant local laws and regulations and the employment management procedures of the Group to ensure that the age of the candidate meets the legal requirements and conducts an interview before the candidate is hired so that there is no recruitment of child and forced labour. The Group strictly abides by the Labour Law of the People's Republic of China, the Regulations of the People's Republic of China on the Prohibition of Child Labour, the Law of the People's Republic of China on the Protection of Minors and other relevant labour laws and regulations in its employee recruitment. The Group is not aware of any illegal or non-compliance that would have a significant impact on it during the reporting period, or any case of child labour or forced labour during the reporting period.

¹⁴ Average training hours = Total number of training hours for employees in the specific category during the reporting period / Total number of employees in the specific category at the end of the reporting period

Operating Practices

Supply Chain Management

The suppliers of the Group are mainly intermediaries that provide services to the Group's investments business, including but not limited to law firms, accounting firms, evaluation companies, auction companies, rating companies, consulting companies, etc. In 2019, the Group introduced a trial run of a set of internal measures named, the "Administrative Measures for the Selection and Engagement of Intermediary Service Institutions" the purpose of which is to standardise and uniformly manage its engagement of intermediary agencies for its investments business. The property leasing business of the Group does not depend on suppliers heavily, and the relevant suppliers provide green plants, furniture, office supplies, etc. for the plaza. Therefore, this chapter focuses only on the supply chain management of the investments business units of the Group. During the reporting period, major suppliers of the Group did not involve in manufacturing or other activities that had a significant impact on the environment. Therefore, the Group considered that no significant environmental risks had arisen from its major suppliers during the reporting period. During the reporting period, a total of 16 intermediaries provided services to the Group's investments business, all from Mainland China.

Engagement practices for suppliers, implementation and monitoring methods

To manage the environmental and social risks of its supply chain, the Group has set up an "Intermediary Agencies Candidate Pool Management System" for the selection of intermediary agencies, which is implemented by the intermediary management unit of the Group. If an intermediary agency is interested in applying to be included in the candidate pool, it may submit the required information to the Group, and the intermediary management unit shall review its qualifications in accordance with the relevant criteria as provided in the internal policy of the Group, including but not limited to the candidate being or having:

- Established in accordance with the relevant laws, and industry qualifications, and maintained normal operation in recent years;
- Good credit, and has not been punished by relevant departments or industry associations in recent years;
- Sound internal management system and quality control system;
- No record of having damaged the interests and reputation of the Group when working with the Group in the past; and
- No incidents of being excluded from the candidate pool or being rejected engagement by the Group in the past.

If the intermediary agency meeting the related criteria will be included and registered in the candidate pool, the related application materials of the candidate will be archived and kept by the Group's archive management unit.

When a business unit of the Group submits an application for engaging an intermediary agency as needed, different business units of the Group will need to appoint representatives to form a selection team for intermediary agency selection.

Operating Practices (Continued)

Supply Chain Management (Continued)

Engagement practices for suppliers, implementation and monitoring methods (Continued)

Under normal circumstance, the Group will engage suppliers that have been included in the candidate pool. If there are special conditions that no supplier in the candidate pool can satisfy the demand of the Group, the Group may engage suppliers that are not in the candidate pool. For example, no supplier in the candidate pool has a specific qualification.

Upon the completion of the project, the service quality of the intermediary service agency and its related workers are evaluated, based on the criteria and standards of the evaluation formulated by the intermediary management unit of the Group. The eligibility of an existing intermediary agency of the Group will be removed from the candidate pool under the following circumstances:

- Changed in qualification conditions, etc., resulting in the intermediary agency not meeting the criteria for candidate pool inclusion;
- Being punished by the relevant administrative department, trade association or other authorities or regulators;
- Disclosing the Group's secrets or harming the interests of the Group;
- Obtaining the service items by improper means, such as bribery or collusion;
- Producing false and untrue reports; and
- Other cases that do not qualify for the candidate pool.

Operating Practices (Continued)

Product Responsibility

Due to the nature of its businesses which involved solely the provision of services during the reporting period, the Group believes that product health and safety, advertising and labeling matters did not have a significant impact on the Group during the reporting period. Nevertheless, the Group is committed to operating in a responsible manner and enhancing its performance in all aspects of the supply chain and value chain, including service safety, complaint handling, responsible marketing, personal privacy protection and management of suppliers' environmental and social performance.

During the reporting period, the Group complied with laws and regulations relating to product responsibility in Mainland China and Hong Kong, including but not limited to, Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong), Law of the People's Republic of China on the Protection of Consumer Rights and Interests and Fire Control Law of the People's Republic of China.

Safety at the plaza

The Property Manager has formulated an emergency plan for different types of hidden safety hazards at the plaza, covering a total of thirty items under six categories, including security incidents, safety, firefighting, diseases, flood control, falling objects, etc.

Relevant business units of the Property Manager carry out emergency plan drills at the plaza according to the plan every month and organise emergency rescue teams equipped with medicine chests, wheelchairs, fire-fighting suits and various fire extinguishers.

Customer service

The Group understands the importance of maintaining a good relationship with its tenants through continuous interaction and responsiveness to their needs. The Group also has procedures in place to deal with tenant complaints to ensure that the complaints are dealt with in a timely manner.

Privacy matters

The Group's "Employee Handbook" states that its employees should keep customer information and internal information of the Group confidential, otherwise they will be severely punished. The Group also requires its employees to avoid using company email for personal purposes. The Group strictly abided by relevant laws and regulations, including but not limited to the relevant provisions of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) to protect customer information and privacy during the reporting period.

Operating Practices (Continued)

Product Responsibility (Continued)

Privacy matters (Continued)

In order to prevent business risks, protect the interests, rights and information of the Group, maintain the stable and healthy development of the Group, its business units in Mainland China have introduced a trial run of measures and procedures on confidentiality in 2019, the details of which are as follows:

- Relevant information must be produced, sent, received, transmitted, used, copied, preserved and destroyed by designated personnel.
- If it is necessary to provide internal information for external communication and cooperation, an employee should obtain approval and/or consent through internal procedures and, if circumstances permit, require the other party to sign a confidentiality agreement.
- Improve internal work processes and limit employees' access to relevant information that is not related to their job content and duties.
- Improve the Group's file management system, and formulate guidelines to specify the confidentiality classification system of data and the range of personnel allowed to access.
- The human resources departments of the Company and each of its subsidiaries are responsible for arranging for employees to sign relevant confidentiality documents when they are hired.
- The person in charge of each department should provide training on confidentiality to its employees; when an employee leaves the Group, the person in charge of the department shall prevent the departing employee from taking away confidential information.

The employment contract signed by each employee of the Group contains a confidentiality agreement. The employees need to comply with this agreement to protect the information of the Group. If it is discovered that an employee has disclosed secrets of the Group, the Group will take corresponding labour disciplinary actions according to the severity of the breach, including but not limited to termination of employment, or pursuing legal claims to recover compensation and/or other legal liabilities.

The Group has formulated the "Archive Management Measures" to strengthen the management of its information. These measures stipulate the procedures for archive management, document collection and arrangement, retrieval, use and handover.

When accessing any file information, employees need to first fill out an application form. Rights to access the files are granted in accordance with internal confidentiality regulations, business secrets, and intellectual property rights management requirements. Those who need access exceeding the rights granted need approval by the relevant supervisors.

Operating Practices (Continued)

Anti-corruption

The Group abides by a set of high ethical standards, and is committed to establishing and maintaining an overall ethical culture and ensuring that the Group operates its businesses with a high degree of integrity. The employee handbook of the Group states that its employees shall not accept or offer bribes or other unlawful benefits for the convenience of their duties or conducts that violate their duties. All managers of the Group must also communicate such policy of the Group with the employees and strive to establish a good corporate governance culture for the Group. The Group also provides anti-corruption training to its directors and employees from time to time.

During the reporting period, the Group strictly adhered to the laws and regulations in Mainland China and Hong Kong relating to bribery, extortion, fraud and money laundering, including but not limited to:

- Anti-Money Laundering Law of the People's Republic of China
- Criminal Law of the People's Republic of China
- Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong)
- Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Chapter 615 of the Laws of Hong Kong)

Violation of the above laws and regulations may result in fines, imprisonment, civil and/or criminal consequences. The Group has formulated and actively improved its relevant systems and preventive measures. During the reporting period, the Group did not have any material non-compliance matters in this regard, and there were no corruption cases brought or concluded against the Group or its employees.

Community

Community Investment

The Group is committed to maintaining the sustainability of its business and the communities in which it operates. The Group is also committed to promoting community development in the areas where it operates, with human and financial support for the related development projects of the most important concern. The Group advocates a people-oriented management philosophy, actively encourages its employees to participate in public welfare activities and voluntary services, and contributes economic resources to the development of the communities in which it operates, to provide employment opportunities for the community residents. During the reporting period, the Group prepared for the "Silver Grant International Holdings Group 2020 Love Spreading Volunteering ", which aimed at showing its concern and care for the residents in the Daluo Village in Meizhou City. The event was successfully completed in early 2020.

The Stock Exchange "Environmental, Social and Governance Reporting Guide" Index

		Section/
Su	bject Areas, Aspects, General Disclosures and KPIs	Statement
Subject Area A-E	nvironmental	
Aspect A1 Emiss	ions	
General	Information on:	Emissions
Disclosure	(a) the policies; and	
	 (b) compliance with relevant laws and regulations that have a significant impact on the issue 	
	relating to air and greenhouse gas emissions, discharges into water	
	and land, and generation of hazardous and non-hazardous waste	
KPI A1.1	The types of emissions and respective emissions data	Emissions
KPI A1.2	Greenhouse gas emissions in total (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility)	Emissions
KPI A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility)	Emissions
KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility)	Emissions
KPI A1.5	Description of measures to mitigate emissions and results achieved	Emissions
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, reduction initiatives and results achieved	Emissions
Aspect A2 Use of	Resources	
General Disclosure	Policies on efficient use of resources, including energy, water and other raw materials	Use of Resources
KPI A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per meal)	Use of Resources
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility)	Use of Resources
KPI A2.3	Description of energy use efficiency initiatives and results achieved	Use of Resources
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency initiatives and results achieved	Use of Resources
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced	Immaterial: The Group did not consume packaging materials.

Su	bject Areas, Aspects, General Disclosures and KPIs	Section/ Statement
Aspect A3 The Er	nvironment and Natural Resources	
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources	The Environment and Natural Resources
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them	The Environment and Natural Resources
Subject Area B -	· Social	
Employment and	Labour Practice	
Aspect B1 Emplo	yment	
General	Information on:	Employment
Disclosure	 (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, antidiscrimination, and other benefits and welfare. 	
KPI B1.1	Total workforce by gender, employment type, age group and geographical region	Employment
KPI B1.2	Employee turnover rate by gender, age group and geographical region	Employment
Aspect B2 Health	and Safety	
General Disclosure	 Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards. 	Health and Safety
KPI B2.1	Number and rate of work-related fatalities	Health and Safety
KPI B2.2	Lost days due to work injury	Health and Safety
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored	Health and Safety

Sul	bject Areas, Aspects, General Disclosures and KPIs	Section/ Statement
Aspect B3 Develo	opment and Training	
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities. Note: Training refers to vocational training, it may included internal and external courses paid by the employer.	Development and Training
KPI B3.1	The percentage of employees trained by gender and employee category	Development and Training
KPI B3.2	The average training hours completed per employee by gender and employee category	Development and Training
Aspect B4 Labou	r Standards	
General Disclosure	 Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child or forced labour 	Labour Standards
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour	Labour Standards
KPI B4.2	Description of steps taken to eliminate such practices when discovered	Labour Standards
Operating Practic	es	
Aspect B5 Supply	r Chain Management	
General Disclosure	Policies on managing environmental and social risks of supply chain	Supply Chain Management
KPI B5.1	Number of suppliers by geographical region	Supply Chain Management
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored	Supply Chain Management

		Section/
Su	bject Areas, Aspects, General Disclosures and KPIs	Statement
Aspect B6 Produ	ct Responsibility	
General Disclosure	 Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress 	Product Responsibility/The advertising and labeling matters have no significant impact on the Group.
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons	Immaterial: The Group does not manufacture products.
KPI B6.2	Number of products and service related complaints received and how they are dealt with	No relevant information: The Group does not have related data collection system in place.
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights	Product Responsibility
KPI B6.4	Description of quality assurance process and recall procedures	Immaterial: The Group does not manufacture products.
KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored	Product Responsibility
Aspect B7 Anti-c	orruption	
General Disclosure	 Information on (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering 	Anti-corruption
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases	Anti-corruption
KPI B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored	N/A

S	ubject Areas, Aspects, General Disclosures and KPIs	Section/ Statement
Community		
Aspect B8 Com	munity Investment	
General	Policies on community engagement to understand the needs of the	Community
Disclosure	communities where the issuer operates and to ensure its activities	Investment
	take into consideration the communities' interests	
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns,	Community
	labour needs, health, culture, sport)	Investment
KPI B8.2	Resources contributed (e.g. money or time) to the focus area	Community
		Investment



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